

# Exhibit AF

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF ALAMEDA

ANTHONY HERNANDEZ VALADEZ, ) Case No. 22CV012759  
)  
Plaintiff, )  
)  
vs. )  
)  
JOHNSON & JOHNSON; ALBERTSONS )  
COMPANIES, INC., individually, and )  
as successor-in-interest, parent, )  
alter ego and equitable trustee )  
LUCKY STORES, INC.; LUCKY STORES, )  
INC.; SAFEWAY INC.; SAVE MART )  
SUPERMARKETS, individually, and )  
as successor-in-interest, parent, )  
alter ego and equitable trustee of )  
LUCKY STORES, INC.; TARGET ) (Pages 1-114)  
CORPORATION; WALMART INC.; and )  
FIRST DOE through ONE-HUNDREDTH DOE, )  
)  
Defendants. )  
\_\_\_\_\_ )

REMOTE VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF

DR. WILLIAM LONGO

Friday, March 3, 2023

Reported by: John Fahrenwald, CA CSR 14369, RPR  
\_\_\_\_\_

DR. WILLIAM LONGO, on 03/03/2023  
ANTHONY HERNANDEZ VALADEZ vs JOHNSON & JOHNSON, et al.

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<p>1 SUPERIOR COURT OF THE STATE OF CALIFORNIA</p> <p>2 COUNTY OF ALAMEDA</p> <p>3 ANTHONY HERNANDEZ VALADEZ, ) Case No. 22CV012759</p> <p>4 )</p> <p>5 Plaintiff, )</p> <p>6 )</p> <p>7 vs. )</p> <p>8 )</p> <p>9 JOHNSON &amp; JOHNSON; ALBERTSONS )</p> <p>10 COMPANIES, INC., individually, and )</p> <p>11 as successor-in-interest, parent, )</p> <p>12 alter ego and equitable trustee )</p> <p>13 LUCKY STORES, INC.; LUCKY STORES, )</p> <p>14 INC.; SAFEWAY INC.; SAVE MART )</p> <p>15 SUPERMARKETS, individually, and )</p> <p>16 as successor-in-interest, parent, )</p> <p>17 alter ego and equitable trustee of )</p> <p>18 LUCKY STORES, INC.; TARGET )</p> <p>19 CORPORATION; WALMART INC.; and )</p> <p>20 FIRST DOE through ONE-HUNDREDTH DOE, )</p> <p>21 )</p> <p>22 Defendants. )</p> <p>23 _____)</p> <p>24</p> <p>25 Remote Videotaped Videoconference Deposition of</p> <p>deponent DR. WILLIAM LONGO, taken on behalf of the</p> <p>defendants, commencing at 10:43 a.m., Eastern Standard</p> <p>Time, Friday, March 3, 2023, before Reporter John</p> <p>Fahrenwald, Certified Shorthand Reporter for the State of</p> <p>California, CSR No. 14369, RPR.</p>	<p>1 INDEX</p> <p>2</p> <p>3 DEPONENT PAGE</p> <p>4 DR. WILLIAM LONGO</p> <p>Examination by MR. DUBIN 6</p> <p>5 Examination by MR. CHARCHALIS 96</p> <p>6</p> <p>7</p> <p>8</p> <p>9 EXHIBITS PAGE</p> <p>10 No. 1 Deposition notice 6</p> <p>11 No. 2 MASSG210 Calidria documents 7</p> <p>12 No. 3 Su affidavit 17</p> <p>13 No. 4 Slides 22</p> <p>14 No. 5 Valadez report 74</p> <p>15 No. 6 Chinese Johnson &amp; Johnson report 74</p> <p>16 No. 7 Gunter supplemental report 74</p> <p>17 No. 8 Dr. Su's staining article 74</p> <p>18 No. 9 Photo 82</p> <p>19 No. 10 Photo 82</p> <p>20 No. 11 Witness declaration 84</p> <p>21 No. 12 Chart 113</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES:</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 BY: IAN WILFRED ALIDO RIVAMONTE, ESQ.</p> <p>Kazan, McClain, Satterley &amp; Greenwood</p> <p>5 55 Harrison Street, Suite 400</p> <p>Oakland, CA 94607-3858</p> <p>6 Phone: 510-302-1000</p> <p>Fax: 510-835-4913</p> <p>7 irivamonte@kazanlaw.com</p> <p>8</p> <p>9 FOR THE DEFENDANTS: JOHNSON &amp; JOHNSON</p> <p>10 BY: MORTON D. DUBIN, II, ESQ.</p> <p>King &amp; Spalding LLP</p> <p>11 1185 Avenue of the Americas, Floor 34</p> <p>New York, NY 10036</p> <p>12 Phone: 212-790-5343</p> <p>mdubin@kslaw.com</p> <p>13</p> <p>14</p> <p>15 FOR THE DEFENDANTS: ALBERTSONS COMPANIES, INC., SAFEWAY INC.,</p> <p>LUCKY STORES, LLC, SAVE MART SUPERMARKETS,</p> <p>16 LLC, TARGET CORPORATION and WALMART INC.</p> <p>17 BY: MITCHELL R. CHARCHALIS, ESQ.</p> <p>Barnes &amp; Thornburg, LLP</p> <p>18 390 Madison Avenue, Floor 12</p> <p>New York, NY 10017-2509</p> <p>19 Phone: 310-284-3768</p> <p>Fax: 646-746-2001</p> <p>20 mcharchalis@btaw.com</p> <p>21</p> <p>22</p> <p>23 ALSO PRESENT: Michael Saito, videographer</p> <p>24</p> <p>25</p>	<p>1 SUWANEE, GEORGIA</p> <p>2 MARCH 3, 2023</p> <p>3 10:43 A.M., EST</p> <p>4</p> <p>8:35:38AM 5 VIDEOGRAPHER: We are now recording and on the</p> <p>6 record. My name is Michael Saito. I'm a legal video</p> <p>7 specialist for iDepo Reporters.</p> <p>8 Our business address is 898 North Pacific Coast</p> <p>9 Highway, Suite 475, El Segundo, California, 90245.</p> <p>8:43:18AM 10 I'm not related to any party in this action,</p> <p>11 nor am I financially interested in the outcome in any way.</p> <p>12 Today is March 3rd, 2023, and the time is</p> <p>13 7:43 a.m., Pacific Time.</p> <p>14 This is the deposition of Dr. William Longo in the</p> <p>8:43:36AM 15 matter of Anthony Hernandez Valadez, plaintiff,</p> <p>16 versus Johnson &amp; Johnson, et al, defendants, in the Superior</p> <p>17 Court of the State of California, County of Alameda. And</p> <p>18 the Case No. is 22CV012759.</p> <p>19 This deposition is being taken via videoconference</p> <p>8:43:59AM 20 on behalf of the defendant. The court reporter is John</p> <p>21 Fahrenwald of iDepo Reporters.</p> <p>22 Counsel will state their appearances.</p> <p>23 MR. DUBIN: Well, my name is Morton Dubin from</p> <p>24 King &amp; Spalding. I represent the Johnson &amp; Johnson-related</p> <p>8:44:13AM 25 defendants in this case.</p>

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<p style="text-align: right;">Page 6</p> <p>8:44:17AM 1 MR. RIVAMONTE: Good morning. Ian Rivamonte of 2 Kazan, McClain, Satterley &amp; Greenwood for the plaintiff. 3 MR. CHARCHALIS: Mitchell Charchalis for 4 defendants: Albertsons Companies, Inc., Safeway Inc., Lucky 8:44:28AM 5 Stores, LLC, Save Mart Supermarkets, LLC, Target Corporation 6 and Walmart Inc. 7 BY MR. DUBIN: Okay. So I'm going to mark 8 Exhibit 1, the notice of deposition today, if we can just 9 please pull that up, Mr. -- 8:44:51AM 10 THE WITNESS: Did we finish with the swearing in? 11 MR. DUBIN: Oh, sorry. Did we not do that? 12 THE WITNESS: I'd let you go ahead, but. . . 13 MR. DUBIN: Oh, sorry. So let's swear in the 14 witness. I apologize. I thought we had done that. 8:45:00AM 15 VIDEOGRAPHER: Mr. Court Reporter, can you please 16 administer the oath? 17 18 DR. WILLIAM LONGO, 19 called as a witness herein, having been first duly sworn, 8:45:08AM 20 was examined and testified as follows: 21 22 EXAMINATION 23 BY MR. DUBIN: 24 Q. Now let's start with Exhibit 1. 8:45:17AM 25 (Exhibit No. 1 was marked for identification.)</p>	<p style="text-align: right;">Page 8</p> <p>8:46:48AM 1 Q. And that's the oil that you used for purposes of 2 your analysis in the Valadez report for Johnson &amp; Johnson? 3 A. Yes. 4 Q. Okay. And we'll come back to this later, but I 8:47:00AM 5 just want to make sure I understand what this is. It says: 6 SG210 Calidria chrysotile 0.05 percent. 7 Does that mean that this is a spiked talc sample? 8 A. It is. 9 Q. Okay. What talc was used for purposes of the 8:47:18AM 10 spike? 11 A. <b>Johnson's Baby Powder sample 13 that I purchased</b> 12 <b>back in 2017. The same one we've been using for all of</b> 13 <b>them.</b> 14 Q. So a Chinese-sourced sample? 8:47:33AM 15 A. Yes. 16 Q. And just so the record is clear, when we say 17 "spiked," it means that you intentionally added some known 18 amount of SG210 Calidria chrysotile to the baby powder for 19 purposes of the analysis. Correct? 8:47:53AM 20 A. <b>That is correct.</b> 21 Q. Do you have any references for SG210 Calidria 22 chrysotile or any other type of Calidria chrysotile in 1560 23 oil that do not have talc? 24 A. <b>I don't think so.</b> 8:48:16AM 25 Q. Okay. Well, if you want to confirm that at any</p>
<p style="text-align: right;">Page 7</p> <p>8:45:20AM 1 Q. (BY MR. DUBIN:) I'm showing you the notice of your 2 deposition today that came with a set of requests for 3 production of documents. 4 Have you seen that before? 8:45:27AM 5 A. Yes. 6 Q. Okay. And we received -- I can't remember if it 7 was yesterday or the day before -- a variety of reports, 8 including some reports specific to this case as well as some 9 reports that related to your Chrysotile Standards. 8:45:49AM 10 Are -- you're aware of that? 11 A. I am. 12 Q. Okay. And I'll mark as the next exhibit something 13 I received this morning. That will be Exhibit 2. And it 14 contains a series of images. It's entitled MASSG210 8:46:13AM 15 Calidria documents. 16 (Exhibit No. 2 was marked for identification.) 17 Q. (BY MR. DUBIN:) These are also from your 18 laboratory; is that correct? 19 A. Yes. 8:46:22AM 20 Q. Do you have any understanding of why these 21 references were not included in the initial production that 22 we received or . . . 23 A. <b>I just forgot about them.</b> 24 Q. Okay. And these references are in 1560 oil? 8:46:47AM 25 A. Yes.</p>	<p style="text-align: right;">Page 9</p> <p>8:48:20AM 1 break, just let me know and we can come back to that. But 2 if you do have them, we would request production. 3 So we'll come back to that in a little bit. 4 Let's cover a little bit of basics about where we 8:48:38AM 5 are with your current opinions. 6 As I understand it, at this point, you are 7 testifying that you hold the view to a reasonable degree of 8 scientific certainty that everyone container of cosmetic 9 talcum powder sourced from Italy or U.S. mines contains 8:49:00AM 10 asbestos; is that right? 11 MR. RIVAMONTE: Vague and overbroad. 12 Q. (BY MR. DUBIN:) You can respond. 13 A. <b>Sort of.</b> 14 Q. Okay. I believe you testified in -- you were 8:49:16AM 15 asked in your deposition in the Graf case whether it was 16 your opinion that every container of cosmetic talcum powder 17 sourced from Italy or U.S. mines contains asbestos, and your 18 answer was "Yes." 19 Has that changed? 8:49:32AM 20 A. <b>It's not changed, but there was an explanation</b> 21 <b>along with that.</b> 22 Q. Okay. Go ahead and give me your explanation. 23 A. <b>It's that if you could analyze enough of the</b> 24 <b>material and get the detection limit much lower, it would be</b> 8:49:49AM 25 <b>my opinion that you would find asbestos. I think what I've</b></p>

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<p style="text-align: right;">Page 10</p> <p>8:49:53AM 1 <b>said, within a reasonable degree of scientific certainty, is</b>  2 <b>that every mine in the world that has talc in it is going to</b>  3 <b>have asbestos in it.</b>  4 Q. And, again, I'm just asking because your answer to  8:50:07AM 5 the question: Is it your opinion that every container of  6 cosmetic talcum powder sourced from Italy or the U.S. mines  7 contains asbestos?  8 Your answer, under oath, in Graf was "Yes."  9 Is that still your testimony?  8:50:20AM 10 <b>A. It is still my testimony if you can reduce the --</b>  11 <b>increase the detection limit to degree necessary, you will</b>  12 <b>find asbestos in every container of talc.</b>  13 Q. Okay. And is it still true that you cannot name  14 any peer-reviewed study that has ever agreed with your view  8:50:40AM 15 that all cosmetic talcum powder in the United States and  16 Italy contains asbestos?  17 <b>A. That is true. That's no peer-reviewed paper out</b>  18 <b>there that I'm aware of.</b>  19 <b>And I'm not aware of anybody out there who has</b>  8:50:53AM 20 <b>analyzed more containers of cosmetic talc from different</b>  21 <b>mine sources than MAS.</b>  22 Q. And is it -- is it still the case that using your  23 current methodology, you are finding what you are calling  24 chrysotile in a hundred percent of the bottles of cosmetic  8:51:12AM 25 talc that you were analyzing?</p>	<p style="text-align: right;">Page 12</p> <p>8:52:36AM 1 non-detects, are you finding chrysotile, a hundred percent  2 of the time in cosmetic talc bottles?  3 <b>A. Yeah. Eliminating the two non-detects and the</b>  4 <b>non-detects before, we are finding it regularly.</b>  8:52:49AM 5 Q. Okay. What were you analyzing with the two  6 non-detects?  7 <b>A. I don't recall. It wasn't Johnson &amp; Johnson.</b>  8 Q. Okay. We're going to request production of any  9 report that you prepared regarding those, those samples.  8:53:09AM 10 Is it -- are you as I understand it, are you now  11 offering the opinion that even using one the bottle of  12 cosmetic talc results in exposure that is significantly  13 above background?  14 MR. RIVAMONTE: Vague and overbroad.  8:53:30AM 15 THE WITNESS: Yes, and no.  16 Q. (BY MR. DUBIN:) Okay. Go ahead and explain.  17 <b>A. Yes. If there has been -- if we find a</b>  18 <b>significant amount of material in that that or it's -- it's</b>  19 <b>one of the types of cosmetic talcs that we've done lot of</b>  8:53:46AM 20 <b>testing on where we have a high percentage, that its getting</b>  21 <b>exposed with one container would be significantly above</b>  22 <b>background in my opinion.</b>  23 <b>Now, it may be minimus compared to everything else</b>  24 <b>and it may not have any affect on anything else, but you</b>  8:54:05AM 25 <b>can't take away the fact that this product has asbestos</b></p>
<p style="text-align: right;">Page 11</p> <p>8:51:17AM 1 <b>A. First off, it is not my method. It is the</b>  2 <b>Colorado School of Mines' method on behalf of Johnson &amp;</b>  3 <b>Johnson who then buried that method for -- until they</b>  4 <b>produced it. So I want to get that straight.</b>  8:51:31AM 5 <b>Second is, we're finding it -- we had a recent one</b>  6 <b>where there's two samples did not have it in it. But we're</b>  7 <b>finding it in a high percentage of the samples.</b>  8 <b>And for me, that's as expected.</b>  9 MR. DUBIN: Okay. Move to strike the  8:51:45AM 10 nonresponsive portion of the answer.  11 Q. (BY MR. DUBIN:) Dr. Longo, are you also finding  12 chrysotile routinely without using heavy density liquid  13 separation?  14 <b>A. No, we quit doing that some time ago. It really</b>  8:52:01AM 15 <b>didn't make any sense.</b>  16 <b>And we're now finalizing the protocol for the</b>  17 <b>heavy liquid density, so we're only doing heavy liquid</b>  18 <b>density probably for the last year or so.</b>  19 Q. Okay. Other than those two bottles that you  8:52:17AM 20 reference -- and I'll ask you about them in a second -- are  21 you finding what you are claiming to be chrysotile in every  22 container of cosmetic talc that you are analyzing?  23 <b>A. Well, as I just stated, we had a recent project</b>  24 <b>where two of them were non-detects.</b>  8:52:35AM 25 Q. Right. And as I asked you: Other than those two</p>	<p style="text-align: right;">Page 13</p> <p>8:54:08AM 1 <b>fibers in it. And technically there is no background of</b>  2 <b>asbestos, so it would be significant. Over background.</b>  3 Q. In that answer, how are you defining  4 "significant"?  8:54:22AM 5 <b>A. Significant is -- it was 0.00005. But I looked at</b>  6 <b>another ATSDR document -- and I think I referenced it</b>  7 <b>there -- and have changed that, I think, to four zeros and a</b>  8 <b>1.</b>  9 Q. Which ATSDR document?  8:54:51AM 10 <b>A. Excuse me. As a measuring stick so that you can</b>  11 <b>have something to compare it to.</b>  12 Q. And when you're making that comparison, is that  13 number, the four zeros and a five or four zeros and a one,  14 is that an exposure assumed to continue throughout  8:55:09AM 15 somebody's life?  16 <b>A. Well, no. I'm not -- the exposure along</b>  17 <b>somebody's life would depend on any air samples that were</b>  18 <b>taken by that person. You know, you just can't say, here's</b>  19 <b>an exposure. I'm just using it as a measuring stick so that</b>  8:55:29AM 20 <b>I can compare one to the other, but I'm not making</b>  21 <b>any assumptions that this is what's -- this is what this</b>  22 <b>person's exposure is for their life.</b>  23 <b>Like what does that mean? Like when they're in</b>  24 <b>bed sleeping? And it just sounds silly to me.</b>  8:55:45AM 25 Q. That's what I'm asking you. Is that background</p>

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<p style="text-align: right;">Page 14</p> <p>8:55:47AM 1 number that you're talking about, is that yardstick, a  2 number that is representing ambient or background exposure  3 during the course of the person's life? Is that what it is  4 intending to represent?</p> <p>8:55:59AM 5 <b>A. No. It's intended to represent is, if you're  6 going to make up -- not make up a number -- but if you're  7 going to use an artificial background, this would be one  8 that ATSDR published in, I think, 2000 or 2001, something  9 like that.</b></p> <p>8:56:16AM 10 Q. Well, we've talked about background before. So  11 I'm going to move on to some more specific stuff.  12 Now, as I understand it, you switched PLM machines  13 and microscopes and a camera at some point since your older  14 Johnson &amp; Johnson reports?</p> <p>8:56:38AM 15 <b>A. Yes.</b>  16 Q. Okay. And when did you do that?  17 <b>A. About two years ago.</b>  18 Q. Okay.  19 <b>A. Or so.</b></p> <p>8:56:45AM 20 Q. Is the analysis that you did of the bottle in this  21 case, the Valadez case, the only bottle that -- sorry -- the  22 only time you've used the new PLM microscope and camera to  23 analyze Johnson &amp; Johnson?</p> <p>8:57:07AM 25 <b>A. I believe so because we really haven't  been analyzing Johnson &amp; Johnson for a while. I can't think</b></p>	<p style="text-align: right;">Page 16</p> <p>8:59:11AM 1 <b>yellow-gold in the gamma direction, to more of a -- I would  2 call it a reddish-gold, brownish-gold-type color. So it's  3 essentially eliminates the yellow.</b></p> <p>8:59:29AM 5 Q. Right. Well, we can talk about it. In other  6 words, so it will push the colors that you're seeing -- for  7 example, shift them away from brighter yellows. It will  8 shift it more towards the magentas or the blues as a matter  9 of optical properties. Right?</p> <p>8:59:46AM 10 <b>A. I didn't say that.</b>  11 Q. Okay.  12 <b>A. We're already in the blues most of the time on the  13 alpha direction, if you look at most of our stuff. Alpha  14 direction was typically in the blues.</b>  15 <b>And it shifted it from a dull yellowish-gold color  16 to more of a reddish-gold, but not down to magenta.</b></p> <p>9:00:04AM 16 Q. Okay. I'm not asking you about what you're  17 finding. We're going to do that.  18 What I'm asking you about is the effect of  19 changing the oil.  20 (Simultaneous speaking.)  21 <b>A. But your question seemed to suggest that it was  22 pushing it down in the magenta and blues and it was already  23 in the blues.</b>  24 <b>And, no, it's not pushing it all the way down to  25 the magenta. That's 1866b large bundles.</b></p>
<p style="text-align: right;">Page 15</p> <p>8:57:10AM 1 <b>of any Johnson &amp; Johnsons that may have been analyzed with  2 these new scopes.</b>  3 Q. Okay. And as we -- we'll discuss, you've changed  4 from a 1550 oil to a 1560 oil. Correct?</p> <p>8:57:27AM 5 <b>A. Yes.</b>  6 Q. And why did you make that change?  7 <b>A. Well, we had been criticized, I think, by  8 Dr. Sanchez, by Segrave that we should be going through a  9 higher refractive indices fluid to validate what we're  10 doing.</b></p> <p>8:57:47AM 11 <b>And then Dr. Su's published paper came out in The  12 Microscope and that was a recommendation in that paper that  13 we -- well, he had like a litigation and whatever and said  14 that if you should pick the refractive indices fluids for  15 the alpha and gamma for where you're ending up in; meaning,  16 you know, if your gamma is ending up in the 1.560 to 1.567,  17 which we're seeing a lot of, get a refractive indices fluid  18 that's specifically in that area. So the 1.560 covers that.</b></p> <p>8:58:12AM 19 Q. And what is the effect on the colors that you are  20 viewing if you change from a 1550 oil to a 1560 oil? And  21 I'm not asking about specific to your analyses here. I'm  22 asking as a general matter, what will you expect to see  23 happen to the colors?  24 <b>A. It changes the colors. I didn't know what I was  25 expecting to see, but it changed the colors from this</b></p>	<p style="text-align: right;">Page 17</p> <p>9:00:36AM 1 <b>That's not going to happen with this.</b>  2 Q. We'll talk. Maybe we can do this while we're  3 looking at something to make it easier. And let me -- I  4 want to look at some slides. We can use them to talk about  5 some of these issues.  6 But before we get there, I want to ask you a  7 little bit about the Su affidavit. I've know you've been  8 asked about this a bunch. It will be Exhibit 3. Let me  9 pull that up.  10 (Exhibit No. 3 was marked for identification.)  11 Q. (BY MR. DUBIN:) As a general matter with a camera,  12 when you take an image of something, an image may or may not  13 match what your eye is seeing. Correct?  14 <b>A. Correct.</b></p> <p>9:01:36AM 15 Q. Okay. And with respect to your older work for  16 Johnson &amp; Johnson, is it your view that the images that you  17 have provided and have shown to juries match what the  18 analyst would see under the microscope?  19 <b>A. You have to define "match." You mean like  20 identical?</b>  21 Q. Well, as close as possible.  22 <b>A. The images we take are probably pretty close.  23 Some of them may match, some of them may be slightly off.</b>  24 Q. Okay.  25 <b>A. It just depends on -- but usually what people are</b></p>

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<p style="text-align: right;">Page 18</p> <p>9:02:27AM 1 <b>looking at is a color copy of a copier machine. Those</b>  2 <b>probably don't match.</b>  3 <b>But what I've seen is the intensity of the</b>  4 <b>photographs. And what we're seeing on the screen, when I</b>  9:02:38AM 5 <b>say "intensity," the brightness is typically what you see</b>  6 <b>through the microscope. The colors might be slightly off,</b>  7 <b>but not enough to, in my opinion, change anything that much.</b>  8 Q. How about with --  9 MR. RIVAMONTE: Excuse me. I'm sorry.  9:02:56AM 10 Mr. Dubin -- Mr. Dubin, can I please have a -- can you email  11 me a copy of this Appendix B -- or Exhibit 3, I'm sorry --  12 Exhibit 3 that you're showing to the witness right now?  13 MR. DUBIN: Yeah. Mike, can you email that to  14 him?  9:03:12AM 15 MR. RIVAMONTE: Thank you.  16 MR. DUBIN: No problem.  17 Q. (BY MR. DUBIN:) So how about -- Dr. Longo, how  18 about with the new microscope, is there any difference to  19 you in terms of how faithfully it reproduces what the  9:03:22AM 20 analyst is actually seeing through the microscope?  21 <b>A. Well, same thing. That one gets pretty close</b>  22 <b>because you can adjust the -- adjust the color lighting in</b>  23 <b>lining up the apertures to get pretty close to where what</b>  24 <b>you're looking in the microscope is exactly what you're</b>  9:03:48AM 25 <b>seeing on the monitor. So it's better than the old system.</b></p>	<p style="text-align: right;">Page 20</p> <p>9:05:26AM 1 Q. Well, they can't both look more like. Right?  2 Which one looks more like what you would see under  3 the microscope, analyzing talc in your laboratory?  4 <b>A. It just depends on --</b>  9:05:40AM 5 Q. Sorry, what?  6 <b>A. It just depends on the sample, what we're seeing</b>  7 <b>because the conditions of the microscope, for brightness,</b>  8 <b>never changes. So I don't know what Dr. Su did here. You</b>  9 <b>know, we can absolutely know that, for the bottom sample,</b>  9:05:58AM 10 <b>for the bottom picture, he did Photoshop. And he may have</b>  11 <b>done Photoshop on the top one to reduce the brightness. I</b>  12 <b>just don't know.</b>  13 Q. So you think maybe A is reduced from your image?  14 Reduced brightness?  9:06:16AM 15 <b>A. It does not look like the image that I believe --</b>  16 <b>you know, I haven't looked at it in a long time, but I don't</b>  17 <b>know what he did. It's hard me to sit here and make -- I</b>  18 <b>can't make any testimony about Photoshopped photographs.</b>  19 <b>So, you know, get Dr. Su to give a deposition and</b>  9:06:35AM 20 <b>say what he did and then I'd have some opinions here, other</b>  21 <b>than I didn't know you were allowed to Photoshop photographs</b>  22 <b>that you would put in a report and say, even though I wasn't</b>  23 <b>there when this sample was analyzed, I was over in China,</b>  24 <b>here's what I think it should have like if they turned the</b>  9:06:55AM 25 <b>brightness up. It's just silly.</b></p>
<p style="text-align: right;">Page 19</p> <p>9:03:51AM 1 Q. Okay. And so if we go forward -- I just want to  2 ask you a question about these images on page 6 and 7.  3 So one of these, as I understand it, is the  4 original illumination and one is with added illumination  9:04:13AM 5 from a photo-editing program. Right?  6 <b>A. I mean, that's what I'm assuming. You have -- did</b>  7 <b>some sort of Photoshop.</b>  8 Q. Okay. On the bottom image, you can obviously see  9 a lot more particles than you can on the top. Right?  9:04:33AM 10 <b>A. Correct.</b>  11 Q. Would those particles have been visible under the  12 microscope as the analyst saw it, or would they have been  13 obscured like they are in Image A?  14 <b>A. Well, see, I don't know what's happened here. The</b>  9:04:49AM 15 <b>images that I believe we have under the top one, you see a</b>  16 <b>lot more than what you're seeing there. I don't know what</b>  17 <b>he did. I guess he's Photoshopping the bottom one, but</b>  18 <b>since he won't give a deposition, there's really no way to</b>  19 <b>tell exactly what sort of tomfoolery he was doing messing</b>  9:05:09AM 20 <b>around with the photographs.</b>  21 Q. I'm asking, though, which of these appears to be  22 more like what you would see under your microscope if you  23 were looking at a PLM sample of talc in your laboratory?  24 Number A or B?  9:05:24AM 25 <b>A. Both.</b></p>	<p style="text-align: right;">Page 21</p> <p>9:06:57AM 1 Q. Well, what I'm asking you is: You've seen talc  2 samples under the PLM microscope. Correct?  3 <b>A. I've seen them under a PLM microscope, but you're</b>  4 <b>asking me to give opinions on what something looks like in</b>  9:07:11AM 5 <b>ours versus here in something that's been Photoshopped and</b>  6 <b>no idea what Dr. Su did.</b>  7 <b>I just can't do that, and I won't.</b>  8 Q. You can't tell me which of these images looks more  9 like what you would see under a PLM microscope if you were  10 analyzing talc in your laboratory? You can't tell me that?  11 <b>A. I've already told you once, and you didn't like</b>  12 <b>the answer. I said: We see both. We see ones that are</b>  13 <b>like the top one, and we'll see ones like the bottom one.</b>  14 <b>What we don't see is anything that comes close to</b>  9:07:42AM 15 <b>the yellow that he has on the bottom where, you know, he</b>  16 <b> jerked up the brightness on his Photoshopping device.</b>  17 Q. Okay. Let's go to page 8 of this. So this is, I  18 think, what we were referring to before. It says: In this  19 case, the rule of thumb to bring the yellow CSDS color to  9:08:14AM 20 purple or magenta or blue range by using a merging liquid  21 with a great RI such a 1560 or 1570.  22 And that's what we were referring to earlier about  23 changing the oil to try to address the issue of chrysotile  24 identification. Correct?  9:08:37AM 25 <b>A. Yes. I've changed the oil to show that even in</b></p>

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<p style="text-align: right;">Page 22</p> <p>9:08:41AM 1 <b>1.560, we get the exact same -- pretty much the exact same</b>  2 <b>refractive indices, except the colors are different or the</b>  3 <b>gamma.</b>  4 Q. Right. But so I have some slides that we could  9:08:58AM 5 call up, and we'll try to walk through those a little bit to  6 discuss what we're referencing.  7 So let's call those up, and we can mark them as  8 Exhibit 4, I guess.  9 (Exhibit No. 4 was marked for identification.)  8:49:12AM 10 Q. (BY MR. DUBIN:) And you can send a copy if you  11 want to -- well, actually, I'm going to do them one at a  12 time, so not yet. Let's just call Exhibit 4 -- and  13 eventually I'll mark them all as Exhibit 4. Let's pull them  14 up, Mike.  9:09:35AM 15 MR. RIVAMONTE: Mr. Dubin, if you are --  16 MR. DUBIN: I'll send you a hard copy of them  17 eventually, but I'm only going to ask him about the ones  18 that are on the screen.  19 Q. (BY MR. DUBIN:) All right. So just some basics.  9:09:47AM 20 I know we all know this, but just so we have it on the  21 record here, what are we looking at here, Dr. Longo?  22 <b>A. You're looking at what it says right at the</b>  23 <b>bottom, central stop dispersion staining colors for</b>  24 <b>chrysotile in 1.550 RI liquid.</b>  9:10:07AM 25 Q. Okay. And so this is 1550, that's what you were</p>	<p style="text-align: right;">Page 24</p> <p>9:11:58AM 1 <b>kick are wrong.</b>  2 Q. I'm asking a different question. That magenta  3 color, the predominant color, where would you characterize  4 that in terms of the wavelength?  9:12:14AM 5 <b>A. I would characterize that between about 520 to</b>  6 <b>550, 560, somewhere in there.</b>  7 Q. 550 or 560, okay. We'll come back to that --  8 <b>A. In the yellow ones, I would characterize around</b>  9 <b>the -- the smaller yellow ones are characteristic of what</b>  10 <b>we're seeing for the chrysotile in the cosmetic talc as well</b>  11 <b>as the SG210, not -- with 1.550 it's around the 1.561 to</b>  12 <b>1.570.</b>  13 Q. Let's go two more in. Actually, we probably don't  14 need to do these.  9:13:17AM 15 We can go to Slide 7.  16 Again, just for purposes of making sure that we  17 have the record clear, one of the things that you've said is  18 that you're identification of chrysotile is based on the  19 birefringence values.  9:13:39AM 20 <b>A. Yes, sir.</b>  21 Q. Okay. And just so we know, in general chrysotile  22 has a lower birefringence; meaning, the colors are closer  23 together. And talc has a higher birefringence; meaning,  24 generally the colors parallel verses perpendicular are  9:13:50AM 25 farther apart.</p>
<p style="text-align: right;">Page 23</p> <p>9:10:10AM 1 using before, but so just so we understand the process that  2 we're all -- we're going to be going through, you have  3 certain wavelengths of light and they correspond to various  4 colors and that's how we can start to talk a little bit  9:10:25AM 5 about what mineral's being identified. Right?  6 <b>A. Per a particular type of -- that's right. For a</b>  7 <b>particular type of RI fluid for a particular type of</b>  8 <b>mineral.</b>  9 Q. Okay. And alpha is perpendicular and gamma is  9:10:45AM 10 parallel?  11 <b>A. Yes, sir.</b>  12 Q. Okay. Great. And I know we've -- if we go to the  13 next slide, I know you've testified about this repeatedly so  14 we won't go through it much.  9:10:59AM 15 Go to Slide 2. This is the ISO reference  16 chrysotile showing what predominant color there?  17 <b>A. Oh, this -- you know -- oh, it's got to be</b>  18 <b>magenta. That's the predominant color.</b>  19 <b>But you also can see smaller structures there,</b>  9:11:29AM 20 <b>like if you go to the -- a little bit off-center, down to</b>  21 <b>the bottom of that bundle, guess what? You see almost a</b>  22 <b>yellow-looking chrysotile. It's the size of the chrysotile</b>  23 <b>bundles that affect the colors. So -- and you can see some</b>  24 <b>yellow streaks through that bundle. So either it can't ever</b>  9:11:53AM 25 <b>do that, or, most -- the people who are on this magenta/blue</b></p>	<p style="text-align: right;">Page 25</p> <p>9:13:51AM 1 Is that fair?  2 <b>A. That's fair.</b>  3 Q. Okay. Now, if we look at how this works, if you  4 go to Slide 8 -- okay.  9:14:07AM 5 As your yellow in parallel gets darker, assuming  6 that the other value remains the same -- the perpendicular  7 value remains the same -- you're going to lower your  8 birefringence. Correct?  9 <b>A. As it gets darker -- well, that's -- you know,</b>  9:14:37AM 10 <b>darker, lighter, et cetera, that's in the eye of the</b>  11 <b>beholder.</b>  12 <b>But as you bring the -- the perpendicular in</b>  13 <b>parallel, refractive indices closer together, the</b>  14 <b>birefringence is reduced.</b>  9:15:00AM 15 <b>As you increase the distance between the two, the</b>  16 <b>birefringence increases, that's -- and it would only do that</b>  17 <b>with minerals that have double refraction.</b>  18 Q. Okay. But, again, if the perpendicular stays the  19 same, if I start moving in the direction of this arrow on my  9:15:33AM 20 parallel, I will be lowering the birefringence?  21 <b>A. I just said it.</b>  22 Q. Is that correct? I'm trying to put it simpler.  23 <b>A. We will I'd like to keep it more -- you know, you</b>  24 <b>simply can go all over the place. So I've answered the</b>  9:15:49AM 25 <b>question.</b></p>



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<p style="text-align: right;">Page 26</p> <p>9:15:49AM 1 Q. Can you tell me if you see anything inaccurate  2 about what this says here?  3 A. You know, a shade of yellow impacts one side of  4 the birefringence.  9:16:02AM 5 But typically, as one starts impacting, it's not  6 just a gamma but alpha because you're getting double  7 diffraction. So I answered the question.  8 Q. Okay, Dr. Longo.  9 And the next slide, we've talked about this  9:16:20AM 10 before. You're familiar that in Dr. Su's publications, he  11 says that yellow is the hardest CSDS color to be quantified  12 and should be avoided at all costs. Right?  13 A. Yes, sir. I've seen that.  14 But of course you left the part out about he only  9:16:41AM 15 said that for amphiboles.  16 Q. Okay. And the next slide.  17 And you've testified and acknowledged recently  18 that Dr. Su's statement about that is not limited  19 to amphiboles?  9:16:59AM 20 That's correct. Right?  21 A. When was this one?  22 Q. Maybe a week or so ago.  23 A. Oh, that's from his report that either he wrote or  24 Mickey Gunter. So I can't really put much stock on that,  9:17:19AM 25 but it was never in any of his handouts. And I don't think</p>	<p style="text-align: right;">Page 28</p> <p>9:19:09AM 1 things in the -- for the gamma, you know, the 480, the  2 5.4 -- between 460 and 500.  3 For the alpha, we're seeing a little bit -- not  4 lower than the 680 -- sometimes. And a little bit pushes it  9:19:30AM 5 to the 560. And it also has reduced the birefringence we're  6 seeing.  7 We've not seen -- I don't think I can think of one  8 for seeing anything that gets up to that low end to  9 moderate. It's all -- it's all in the low now.  9:19:49AM 10 So it's a better refractive indices fluid for this  11 type of analysis for these small bundles of chrysotile.  12 Q. Just so we can try to make sure that it's  13 understandable, when you go with the 1.560 instead of 155,  14 [sic] the colors will be moving in the direction of that  9:20:09AM 15 arrow. Correct?  16 MR. RIVAMONTE: Asked and answered.  17 THE WITNESS: Like I've already said, I don't know  18 how many times now, it's reduced -- it's moving out of the  19 yellow-gold more into a reddish, goldish-brown color. So it  9:20:26AM 20 is moving towards the higher -- the higher wavelengths.  21 However, you're using the 1.560 chart, and you're getting  22 the exact same refractive indices.  23 Q. I'm just try to make -- take small bites to make  24 it simple, and that is that it's moving in the direction of  9:20:49AM 25 the arrow.</p>
<p style="text-align: right;">Page 27</p> <p>9:17:24AM 1 it's in his new published paper, either. Not new. It's  2 last year.  3 MR. RIVAMONTE: Mr. Dubin, which deposition is  4 this from?  9:17:38AM 5 MR. DUBIN: We can send you the full deposition.  6 It's the Davis deposition. The cite's at the  7 bottom.  8 MR. RIVAMONTE: Thank you.  9 THE WITNESS: So I still don't agree with the  9:17:49AM 10 yellow portion of that. You can easily determine with  11 yellow.  12 But, again, because if you have the yellow -- the  13 yellow-gold with chrysotile, the birefringence on the  14 fibrous talc is so much different.  8:49:12AM 15 Q. (BY MR. DUBIN:) Okay. So can we go back to  16 Slide A for a second? Maybe we can use this to discuss  17 1.560 verses 1.550.  18 So if I switch from a 1.550 to a 1.560 oil, what  19 will that do -- let's assume something would otherwise be a  9:18:41AM 20 bright yellow, maybe like around 440, which direction will  21 it push the color in parallel? Which direction?  22 A. It pushes the color.  23 MR. RIVAMONTE: Objection. Hypothetical.  24 THE WITNESS: It pushes the color to longer  9:19:03AM 25 wavelengths. So typically when in 1.560, we're seeing</p>	<p style="text-align: right;">Page 29</p> <p>9:20:50AM 1 A. I've already answered this.  2 MR. RIVAMONTE: Asked and answered.  3 Q. (BY MR. DUBIN:) Yeah. You don't seem to be able  4 to answer a simple question, though, is the problem.  9:20:58AM 5 It's moving in the direction of the arrow, yes or  6 no? Can you not answer that question?  7 A. I've already answered it. If there's a simple  8 explanation or a simple answer, I'd give it.  9 But, you know, I've got whatever this -- then, you  9:21:11AM 10 know, this -- you have to live with this. And so I'd prefer  11 to put it in a more of a little bit of scientific term, a  12 scientific answer on what's going on.  13 Q. Okay. Can you tell me anything that is inaccurate  14 with the statement that by moving from 155 to 160 you are  9:21:31AM 15 moving colors in the direction of that arrow? What is wrong  16 about that statement, if anything?  17 MR. RIVAMONTE: Asked and answered.  18 Argumentative.  19 THE WITNESS: I'm not answering it anymore.  8:49:12AM 20 Q. (BY MR. DUBIN:) Okay. Now, let's move next --  21 we'll come back to that. Let's go to Slide 12.  22 So this is an image from one of your older  23 chrysotile reports for Johnson &amp; Johnson. I want to talk a  24 little bit about white balancing. What is white balancing?  9:22:10AM 25 A. White balancing is -- make sure the whites are in</p>

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<p style="text-align: right;">Page 30</p> <p>9:22:13AM 1 <b>range -- not so much in a range -- to help the colors.</b></p> <p>2 Q. Okay.</p> <p>3 A. So I don't know the whole definition of it</p> <p>4 anymore.</p> <p>9:22:24AM 5 Q. Okay.</p> <p>6 A. But it seems to be the new -- I should look it up</p> <p>7 to get it exactly because it seems to be the new question</p> <p>8 for depositions.</p> <p>9 Q. If images aren't appropriately white balanced,</p> <p>9:22:39AM 10 they can either appear too yellow or they can appear too</p> <p>11 blue. Correct?</p> <p>12 A. I don't know. I don't know how correct -- you</p> <p>13 know, this is an older one than this is a -- you have more</p> <p>14 yellows in this because you're using a tungsten lightbulb in</p> <p>9:23:03AM 15 the microscopes and the new ones are LED, so you don't have</p> <p>16 any white balance problems.</p> <p>17 And this wasn't really ever a problem because the</p> <p>18 conditions of these for chrysotile and the fibrous talc were</p> <p>19 the same. So it's not changing anything here when you're</p> <p>9:23:21AM 20 comparing the apples to apples versus comparing apples to</p> <p>21 oranges.</p> <p>22 Q. So my understanding now is that you're saying that</p> <p>23 these images appear more yellow because of tungsten lighting</p> <p>24 that was used in them in the older microscope?</p> <p>9:23:38AM 25 A. Yeah, it's like a yellow light -- not a yellow</p>	<p style="text-align: right;">Page 32</p> <p>9:25:31AM 1 know what color it should be. Right?</p> <p>2 A. I guess. I mean, we're typically not taking</p> <p>3 pictures of owls, so I don't really have an opinion about</p> <p>4 your -- here one way or the other.</p> <p>9:25:48AM 5 Q. Let me just make sure we get the point. So on the</p> <p>6 left here, you've got an owl that's slightly blue. Right?</p> <p>7 And on the right --</p> <p>8 A. Well, slightly blue. You've got like a blue tint</p> <p>9 to the -- to the -- to the leaves. You got a blue tint to</p> <p>9:26:07AM 10 the wood they've got the owl standing on. So you've white</p> <p>11 balanced it and you've taken this picture. I just don't</p> <p>12 recall what was done with the older Olympus with that camera</p> <p>13 on it. It may well have been white balanced. I'd just have</p> <p>14 to check on that.</p> <p>9:26:26AM 15 Q. Well, the point is, you know, if I wanted to know:</p> <p>16 Am I looking at a picture of a real blue owl, one thing I</p> <p>17 could do is I could look and see, oh, wait am I also getting</p> <p>18 a tint on the leaves which I know should be green. Right?</p> <p>19 A. If you're looking at white owl and that's what</p> <p>9:26:45AM 20 shows up, I guess you're correct.</p> <p>21 Q. So if we go to the next slide -- so these are some</p> <p>22 PLM images in the same refractive index oil from Mr. Poye</p> <p>23 and Dr. Sanchez's lab. And you can see that they're a</p> <p>24 substantially different color than your old image of</p> <p>9:27:19AM 25 Johnson &amp; Johnson. Right?</p>
<p style="text-align: right;">Page 31</p> <p>9:23:41AM 1 light, but it has yellow in it. And I think all our</p> <p>2 photographs, going back to the last, you know, 30 years were</p> <p>3 using those type of microscopes.</p> <p>4 Q. Do you know whether the camera that you were using</p> <p>9:23:56AM 5 at that time, whether it had a feature that would allow you</p> <p>6 to white balance to compensate for that tungsten lighting?</p> <p>7 A. Not to the degree it completely removes it.</p> <p>8 Because when you compare these to the LED photographs, you</p> <p>9 don't have the yellow like this.</p> <p>9:24:18AM 10 Q. Okay. And when we're looking at this, for</p> <p>11 example, let's look at the parallel. You have a structure</p> <p>12 that you've identified here as chrysotile. Right?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. And then what are these larger, rounder</p> <p>9:24:37AM 15 structures?</p> <p>16 A. Platy talc.</p> <p>17 Q. Okay. And platy talc, because it's not in an</p> <p>18 elongated form, however you move it, it's going to retain</p> <p>19 the same refractive index? In other words it will always --</p> <p>9:24:59AM 20 it will stay the same color, by and large?</p> <p>21 A. Yes.</p> <p>22 Q. And so if we look at the next slide -- so one of</p> <p>23 the things you can do, will you agree with me, to see</p> <p>24 whether or not something is appropriately white balanced is</p> <p>9:25:25AM 25 to look at something in the image that you know -- where you</p>	<p style="text-align: right;">Page 33</p> <p>9:27:31AM 1 A. They're substantially different from each other.</p> <p>2 Q. The talc is much brighter in both these images.</p> <p>3 Right?</p> <p>4 A. No. I mean, one is kind of grayish, and the other</p> <p>9:27:45AM 5 one's got some yellow for the talc and more whitish. So I</p> <p>6 don't -- you know, it's not the pictures we took, so I</p> <p>7 really don't have an opinion one way or the other on these.</p> <p>8 You can get Dr. Sanchez and Mr. Poye come in and</p> <p>9 testify about what are the conditions here? Oh, that's</p> <p>9:28:05AM 10 right Mr. Poye is not a PLM person. I guess Dr. Sanchez can</p> <p>11 fill in what you're looking for.</p> <p>12 Q. Well, why don't you tell me. If you look at</p> <p>13 talc -- just talk about talc plates -- under a PLM</p> <p>14 microscope in your laboratory, what do they look like?</p> <p>9:28:26AM 15 A. I can't compare mine to these. These are not</p> <p>16 photographs -- I don't think I've seen before, so I really</p> <p>17 don't have an opinion, one way or the others, on these.</p> <p>18 Q. I'm not asking about these images. I'm asking</p> <p>19 you: When you look at talc under your PLM microscope, what</p> <p>9:28:48AM 20 does it look like?</p> <p>21 MR. RIVAMONTE: Vague and overbroad.</p> <p>22 Q. (BY MR. DUBIN:) To your eye. Forget images now.</p> <p>23 What does it look like to your eye?</p> <p>24 A. Well, here's the SG210 in talc, it looks like</p> <p>9:29:01AM 25 this. At times. Other times it can look more -- where you</p>

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<p style="text-align: right;">Page 34</p> <p>9:29:05AM 1 have an overloaded, it can look like that. Here's another</p> <p>2 one. So just depends on the sample, what the loading is and</p> <p>3 how many particles you have.</p> <p>4 Q. I'm asking you, what kind of color is the talc if</p> <p>9:29:24AM 5 you look at it in your microscope with your naked eye?</p> <p>6 A. Here's what it looks like -- my naked eye, here's</p> <p>7 what it looks like right now. This looks -- the 1.560.</p> <p>8 In the 1.550, you got more yellows.</p> <p>9 If you have a heavily-loaded, you might see more</p> <p>9:29:47AM 10 like what's on the right, depending on what fluid you're</p> <p>11 using.</p> <p>12 If it's less loaded, I don't know if I've ever</p> <p>13 seen it -- just talc look like that in Sanchez's PLM. So,</p> <p>14 can't really compare it.</p> <p>9:30:07AM 15 Q. Let's go to the next slide, 15.</p> <p>16 It does not -- just looking at Slide 15, your old</p> <p>17 report for Johnson &amp; Johnson, it does not look like that.</p> <p>18 Correct?</p> <p>19 A. Well, I wouldn't expect it to look like that or</p> <p>9:30:28AM 20 not look like that. You know, samples are different.</p> <p>21 Q. Well, these are the images you gave before. This</p> <p>22 is not the color -- the talc plates, that is not the color</p> <p>23 that you would see looking through the microscope, a PLM, at</p> <p>24 talc in this oil. That's not what it would look like.</p> <p>9:30:47AM 25 Correct?</p>	<p style="text-align: right;">Page 36</p> <p>9:32:36AM 1 A. Yes and no.</p> <p>2 Q. Okay. What's the "no," since the yes is obvious</p> <p>3 in the picture?</p> <p>4 A. The "no" is that when we do these analysis, you're</p> <p>9:32:47AM 5 looking at literally the Becke line around the outer ridge</p> <p>6 of the structure. And the other edge of the structure in</p> <p>7 the gamma is more in the reds. You don't look at the</p> <p>8 overall yellow going across it.</p> <p>9 And same thing on the other side.</p> <p>9:33:05AM 10 So --</p> <p>11 Q. Okay.</p> <p>12 A. You're -- you're miss -- you're not understanding</p> <p>13 on how the analysis is done. You don't look at that overall</p> <p>14 color. You go around the outer edge.</p> <p>9:33:22AM 15 Q. Okay. Do you see the outer edges of the talc</p> <p>16 plates also having what you're referring to as red?</p> <p>17 A. You're looking at a platy structure. It's not --</p> <p>18 and you only got one refractive indice [sic] on a flat</p> <p>19 platy. So we're not -- I don't think -- our criticism is,</p> <p>9:33:44AM 20 is we've been misidentifying fibrous talc not that we're</p> <p>21 identifying chrysotile. We're misidentifying platy talc.</p> <p>22 So -- but the reds around the outer are a little bit</p> <p>23 different than we have on there, and it's not fibrous.</p> <p>24 What you need to be comparing it to is those big</p> <p>9:34:06AM 25 white areas there. That's what happens to fibrous -- to</p>
<p style="text-align: right;">Page 35</p> <p>9:30:48AM 1 A. That's what it has looked like, yes.</p> <p>2 Q. Okay. So you're telling me that with your naked</p> <p>3 eye, that's the color of talc in your -- under your PLM</p> <p>4 machine.</p> <p>9:31:04AM 5 A. Our PLM microscope now, no. The yellows are much</p> <p>6 subdued with yellows -- the yellow-golds in the</p> <p>7 chrysotile.</p> <p>8 But it doesn't change anything about the</p> <p>9 identification of chrysotile. This is all interesting</p> <p>9:31:22AM 10 cross.</p> <p>11 But if you look on the left-hand side, you have</p> <p>12 1.550 -- excuse me, the right-hand side, 1.550 to 1.560 --</p> <p>13 you've got extension at 1.550.</p> <p>14 And then for the gamma, you know, 67 to 70, you</p> <p>9:31:45AM 15 got the refractive indices. I don't think what you</p> <p>16 understand is those real white areas, that's either fibrous</p> <p>17 talc or platy talc on edge. And because you have the white,</p> <p>18 you're way above -- way down in the 400-nanometer range</p> <p>19 because it's all white light in the same way. So you can</p> <p>9:32:07AM 20 easily compare it to show that it is not -- what we've</p> <p>21 analyzed there is not fibrous talc that has the refractive</p> <p>22 indices on it.</p> <p>23 Q. On the left-hand image, you can see that the</p> <p>24 structure you've identified as chrysotile is pretty much the</p> <p>9:32:31AM 25 same color at the platy talc. Right?</p>	<p style="text-align: right;">Page 37</p> <p>9:34:08AM 1 talc. A lot of times in the 1.550, it's out of the</p> <p>2 spectrum. You can't even get a refractive indice. [sic]</p> <p>3 All's you could say is, it's greater than 1.580 or 90 and</p> <p>4 it's less than 1.535.</p> <p>9:34:27AM 5 Q. One thing we know about the idea -- looking at</p> <p>6 talc, one of the reasons that you're saying talc has a high</p> <p>7 birefringence value is because one of the colors that it</p> <p>8 shows is bright yellow. Right? That's a factor in why it</p> <p>9 would have a high birefringence value. Correct?</p> <p>9:34:48AM 10 A. Yes.</p> <p>11 That's only one of the factors.</p> <p>12 Q. Okay. But like the leaves in the picture with the</p> <p>13 owl, your platy talc is not showing that color. Right?</p> <p>14 A. The platy talc is not fibrous and the platy talc</p> <p>9:35:08AM 15 is not -- from straight up, it does not have two refractive</p> <p>16 indices. So -- and it literally disappears when you put it</p> <p>17 in elongation. So you're trying to -- trying to -- apples</p> <p>18 and oranges. You know, I'll reject the argument here.</p> <p>19 Q. Okay.</p> <p>9:35:29AM 20 A. What you need to compare it to is those big white</p> <p>21 areas that are on -- that are in the parallel and</p> <p>22 perpendicular direction in the left and right. That's what</p> <p>23 happens with platy talc -- excuse me, the fibrous talc or</p> <p>24 talc plates on edge. We're not comparing what we're</p> <p>9:35:47AM 25 analyzing to a piece of platy talc. It doesn't make any</p>

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<p style="text-align: right;">Page 38</p> <p>9:35:51AM 1 <b>sense.</b></p> <p>2 Q. Talc in parallel will be the same color as a talc</p> <p>3 plait. Correct?</p> <p>4 <b>A. That makes no sense.</b></p> <p>9:36:07AM 5 MR. RIVAMONTE: Overbroad.</p> <p>6 THE WITNESS: I don't understand the question.</p> <p>7 Q. (BY MR. DUBIN:) You don't understand the question?</p> <p>8 Well, what would be -- how would you compare the color of</p> <p>9 talc in parallel -- elongated talc in parallel and the color</p> <p>9:36:22AM 10 of talc plates?</p> <p>11 <b>A. They're completely different.</b></p> <p>12 Q. They're completely different colors?</p> <p>13 <b>A. Again, I point you back to the white areas. Or I</b></p> <p>14 <b>point you to a lot of examples where we have, you know,</b></p> <p>9:36:41AM 15 <b>intergrowth between a fibrous elongated talc on one side and</b></p> <p>16 <b>chrysotile on the other side. They're completely different.</b></p> <p>17 <b>And we don't even look at that. They're not -- these big</b></p> <p>18 <b>plates -- those plate aren't fibrous.</b></p> <p>19 <b>You want to take the colors of what we're seeing</b></p> <p>9:36:59AM 20 <b>there and then say, well it's the same color.</b></p> <p>21 <b>Then if you look over in elongation, are you</b></p> <p>22 <b>seeing -- I mean in gamma, look how different that color is.</b></p> <p>23 Q. And --</p> <p>24 <b>A. We've got the dark blue to extinction. Talc</b></p> <p>9:37:20AM 25 <b>doesn't do that.</b></p>	<p style="text-align: right;">Page 40</p> <p>9:39:06AM 1 it's not in the equation. And what I do know, if I look</p> <p>2 over in the alpha, we don't see any blues. And if I look at</p> <p>3 what is in perpendicular on that big structure up in the</p> <p>4 left-hand corner, where I say, this is a -- this is a</p> <p>9:39:30AM 5 talc -- talc plates on edge right there or this is fibrous</p> <p>6 talc, and that's now -- in the left-hand side, that's in the</p> <p>7 alpha direction, and you can't see such a blue on the end.</p> <p>8 It's real bright.</p> <p>9 And then on the right-hand side, now it's in the</p> <p>9:39:45AM 10 parallel direction and you still got the white. That's out</p> <p>11 of the range of all the refractive indices. I mean, you're</p> <p>12 looking at greater than 1.590.</p> <p>13 And on the other side, you're looking, less than</p> <p>14 1.535.</p> <p>9:40:05AM 15 Q. All right. Let's see if we can -- we'll come back</p> <p>16 to this issue in a second. Let's go to the next. Let's go</p> <p>17 to Slide 16.</p> <p>18 Typical guidance on how this birefringence value</p> <p>19 should be calculated if we take the highest parallel,</p> <p>9:40:31AM 20 meaning the brightest color, and the lowest perpendicular.</p> <p>21 Correct? That's how birefringence in the published</p> <p>22 literature is calculated. Correct?</p> <p>23 <b>A. No. And no.</b></p> <p>24 Q. Okay.</p> <p>9:40:55AM 25 <b>A. Not calculated at all. If you actually to</b></p>
<p style="text-align: right;">Page 39</p> <p>9:37:20AM 1 Q. We can talk about perpendicular in a second. In</p> <p>2 parallel -- you're selling me that in parallel, talc plates</p> <p>3 and an elongated talc piece will not be the same color?</p> <p>4 MR. RIVAMONTE: Misstates testimony.</p> <p>8:49:12AM 5 Q. (BY MR. DUBIN:) Are they the same or not the same?</p> <p>6 <b>A. Well, which ones do you want to point to?</b></p> <p>7 Q. I'm looking at one in parallel.</p> <p>8 <b>A. I'm looking at a whole range of colors, but I'm</b></p> <p>9 <b>not seeing anything that meets the criteria for a fibrous</b></p> <p>9:37:58AM 10 <b>bundle.</b></p> <p>11 Q. I'm not --</p> <p>12 <b>A. So it's -- we're arguing -- we're debating over</b></p> <p>13 <b>this color when it has no useful ending to it other than a</b></p> <p>14 <b>talking point on your hat.</b></p> <p>9:38:11AM 15 <b>Now I've answered the question. We need to move</b></p> <p>16 <b>on.</b></p> <p>17 Q. Can you tell me what the refractive index of a</p> <p>18 talc plate is?</p> <p>19 MR. RIVAMONTE: Vague and overbroad.</p> <p>9:38:28AM 20 THE WITNESS: I would say the majority of them</p> <p>21 there, you know, are down in the 1. -- 1.5 -- maybe 1.55 --</p> <p>22 1.558 or something like that. I don't know. I'd have to</p> <p>23 go -- I'd need to be looking in the microscope and look at</p> <p>24 the chart.</p> <p>9:39:01AM 25 What I do know is platy talc is not fibrous, so</p>	<p style="text-align: right;">Page 41</p> <p>9:40:58AM 1 <b>published literature -- and I don't know what published</b></p> <p>2 <b>literature you're talking about -- but the ISO method has</b></p> <p>3 <b>you look at a -- the Michel-Levy charts.</b></p> <p>4 <b>You're right. You want to go to the lowest</b></p> <p>9:41:15AM 5 <b>matching wavelength and the highest, but you're not</b></p> <p>6 <b>calculating anything. You're just making a general</b></p> <p>7 <b>guesstimate.</b></p> <p>8 <b>If you go to Deer, Howie and Zussman and you look</b></p> <p>9 <b>at all their mineral data, every one of them will have a</b></p> <p>9:41:32AM 10 <b>range and will have a calculated birefringence just like we</b></p> <p>11 <b>do it.</b></p> <p>12 <b>If you go to the R93 in Table 2.2 and look at the</b></p> <p>13 <b>references for chrysotile and look at the references for</b></p> <p>14 <b>fibrous talc, you will see that they calculate the</b></p> <p>9:41:51AM 15 <b>birefringence just week we have been doing.</b></p> <p>16 <b>But to look at the Michel-Levy charts and make a</b></p> <p>17 <b>guesstimate on what the birefringence is, is not</b></p> <p>18 <b>calculation, and it's not accurate for the way we're doing.</b></p> <p>19 Q. So let me ask you about this testimony then. Go</p> <p>9:42:08AM 20 to Slide 18.</p> <p>21 This is from the Prudencio trial. I asked you:</p> <p>22 But I want to make crystal clear there's no question you're</p> <p>23 using averages instead of high/low. Right? High and low.</p> <p>24 ANSWER: "We do use an average, yes, as I've</p> <p>9:42:29AM 25 stated."</p>

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<p style="text-align: right;">Page 42</p> <p>9:42:30AM 1 QUESTION: "In terms of that technique, you do not  2 know of anywhere where the technique that you're using has  3 been published or put into a scientific method. Right?"  4 ANSWER: "I'm not aware of any, no.  9:42:42AM 5 Is that still correct?  6 <b>A. No, it's not correct. I know maybe there's  7 scientists out there that never look anything up and you  8 know, you were accusing me of fraudulently making the  9 refractive indices closer together in front of the jury.</b>  9:43:00AM 10 <b>And that it -- and of course you were completely  11 wrong. And I went and looked it up. I went and found that  12 Deer, Howie, and Zussman; and every one of their 3 or 4  13 volumes does that.</b>  14 <b>The EPA R93 has a table and shows the  9:43:21AM 15 birefringence being calculated for chrysotile from .007 to  16 .017.</b>  17 <b>And then fibrous talc they have a birefringence  18 calculated as .060; and for cellulose that have it at 0.050.</b>  19 <b>As a scientist when I get something like that and  9:43:48AM 20 I go, that doesn't sound right, and I went and look -- and I  21 go look it up. So I'm not stuck in the past without going  22 and seeing if you were right or wrong. You were wrong.</b>  23 Q. Let's go to the next slide, 19. I want to talk  24 about -- a couple -- this image. This is from the old  9:44:12AM 25 before we go on to some of the newer work.</p>	<p style="text-align: right;">Page 44</p> <p>9:46:08AM 1 <b>And this is exactly how Deer, Howie and Zussman  2 presents data to all the mineralogists who look at that.</b>  3 <b>That's one of the premier books on crystalline structure,  4 information.</b>  9:46:25AM 5 <b>And I don't know how many they have in there.</b>  6 Q. Okay. But you are treating this image, this  7 structure that you're looking at right here, as if it was  8 the color around that line, around the 480 line. Right?  9 MR. RIVAMONTE: Asked and answered.  9:46:48AM 10 THE WITNESS: I didn't say 480.  11 Q. (BY MR. DUBIN:) Let's see if we can do this  12 more -- we'll do this with your new report.  13 <b>A. What I said was, we go 1.569. That's at the 440  14 line is what I said.</b>  9:47:02AM 15 <b>And then for the 1.569 -- excuse me, the 1.556 --  16 you know, you're down around the 520 line -- no, I'm sorry.  17 1.556 is between your 540 and 560 line.</b>  18 Q. Well, we'll do this math instead with some of your  19 newer images.  9:47:34AM 20 Let's go to the --  21 THE WITNESS: Before you ask your next question,  22 unless you're going to move onto something else, we've been  23 going for a little bit over an hour. I'd like to take a  24 10-minute break.  9:47:46AM 25 MR. DUBIN: We can take a 10-minute break.</p>
<p style="text-align: right;">Page 43</p> <p>9:44:15AM 1 So what color are you saying that you are  2 observing in this image?  3 <b>A. Well, if you go around the edge, you're going all  4 the way from almost that extinction on the right-hand side.</b>  9:44:34AM 5 <b>You know, and I'm at it from here -- and then you're going  6 down to 1.569 around the edges on the yellow side. So  7 that's the range.</b>  8 Q. And so when you -- ultimately when you use  9 averages here, you're treating this particle as if the color  9:44:52AM 10 is this orange around here. Right? Like this 480?  11 <b>A. Well, we have 1.569. And, you know, that's going  12 to be around 440.</b>  13 <b>And we have 1.556 which is pretty close to the  14 extinction line.</b>  9:45:23AM 15 <b>Around 540.</b>  16 Q. But -- so by being -- by using averages, you're  17 treating the particle as if it's somewhere in the middle in  18 there. Right? For purposes of your calculations?  19 <b>A. Well, if you take an average of that and you take  9:45:42AM 20 the average of the parallel -- of the perpendicular and  21 calculate the birefringence, it can give you, you know --  22 and I'm hypothetically saying 0.010.</b>  23 <b>Or if you subtract out the gamma -- excuse me --  24 the alpha from the gamma and subtract out for -- it ranges.</b>  9:46:01AM 25 <b>Then you average that, you get the exact same thing.</b></p>	<p style="text-align: right;">Page 45</p> <p>9:47:46AM 1 VIDEOGRAPHER: The time is 8:47, Pacific Time.  2 We're off the record, and this marks the end of Media I.  3 (Off the record at 11:47 a.m., and record resumes  4 at 12:05 p.m., EST)  10:05:47AM 5 VIDEOGRAPHER: The time is 9:05 a.m., Pacific  6 Time, and we're back on the record. This marks the  7 beginning of Media II.  8 Q. (BY MR. DUBIN:) Mike, can you please pull the  9 slides back up? So let's to 23.  10:06:21AM 10 Sorry. Let's go to 22.  11 I want to come back to this change in oils.  12 When it says here: Bring the yellow CSDS color to  13 purple or magenta or blue range, what do you understand that  14 to mean?  10:06:50AM 15 <b>A. I understand that to be that it's rule of thumb,  16 he says, to get the purple or magenta or blue range using  17 1.560 or 1.570 of normal intensity of illumination.</b>  18 <b>So what he's suggesting is, is that you can bring  19 it into that range by using 1.560, but it doesn't get there  10:07:18AM 20 unless you have -- unless you're using the chrysotile from  21 Canada. That's not what he says in his published paper.</b>  22 Q. Okay. So unless you used the chrysotile from  23 Canada, you're saying you won't be able to push the parallel  24 of the chrysotile to blue.  10:07:44AM 25 <b>A. In one point -- well, the -- yeah. We didn't have</b></p>

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<p style="text-align: right;">Page 46</p> <p>10:07:48AM 1 to push it to blue range. It was already in the blue range, 2 and with 1.560 it's still in the blue range. 3 But you're not going to get it to magenta with 4 this type of chrysotile, with either the chrysotile we're 10:08:05AM 5 finding in the cosmetic talc or the SG210. That doesn't get 6 pushed to magenta either. 7 And lastly, his affidavit, I didn't think it was 8 an affidavit -- I don't think -- where he swore to anything. 9 I think it's just a report. Maybe you call it an affidavit, 10:08:25AM 10 but I thought you had to say that you're saying this under 11 oath. 12 But in his published paper from last year, he 13 acknowledges that chrysotile from different sources will 14 have a higher refractive indice [sic] than what is found the 10:08:45AM 15 1866b standard. 16 Q. You said you were already getting blues from what 17 you're calling chrysotile, but in parallel, you were 18 typically getting yellows. Right? 19 A. Yellow-gold, yes, sir, that is correct. That's 10:09:05AM 20 what we were getting. 21 Q. And so the point that he is saying here is to 22 increase the -- from instead of using a 155 to use somewhere 23 in 1560 to 1570, until you turn those yellows into the blue 24 range or purple or magenta. Right? 10:09:28AM 25 A. Well, the yellow is only -- the yellow-gold is</p>	<p style="text-align: right;">Page 48</p> <p>10:11:13AM 1 there are other sources of chrysotile that give you higher 2 refractive indices in the gamma range than what the 1866b 3 is. And he says, use 1.560 for the gamma range because it's 4 more in tune with the refractive indices you're seeing. 10:11:34AM 5 And that's what we did. 6 Q. Okay. And the point being that if you use a -- 7 the oil that is more in tune with your -- what you are 8 reporting as your refractive indices, then you would start 9 to observe blue. 10:11:55AM 10 A. You're not going to -- I mean, again, you read it 11 correctly. But that's not what he's saying in that paper, 12 which is a paper that says to use these ranges. 13 And the only thing he said about changing the 14 1.560 is that, as a rule of thumb -- this is a different 10:12:23AM 15 rule of thumb now, is to have the fluid that you're using in 16 the ranges you're seeing. 17 The now for the gamma -- excuse me -- for the 18 alpha we're already seeing the blues and that's -- and the 19 1.550 works fine there. 10:12:44AM 20 The 1.560 -- also when he has a 1.560 chart that 21 he specifically says, use these charts for quick evaluation 22 for rapid identification of the types of asbestos you're 23 analyzing. 24 Q. Now let's go to the next slide. So here we're 10:13:18AM 25 looking at an image from one of your older reports. Now</p>
<p style="text-align: right;">Page 47</p> <p>10:09:32AM 1 only seen in the gamma discretion. You don't see the -- I 2 would say, nine times out of ten, it's in some blue range 3 already for the alpha. 4 But what I'm curious about is we have this 10:09:46AM 5 affidavit, but then we have his peer-reviewed published 6 paper that doesn't say this. It says the opposite. 7 Q. Okay. All I'm asking you, again, is the idea 8 would be to change the oil to move that parallel from yellow 9 into being in the blue range. Right? To help you 10:10:13AM 10 distinguish where the, you know, where that's really falling 11 for the particle? 12 A. I mean, you read it correctly. But it's not -- 13 it's not what he put in his published paper. So how am I 14 supposed to answer that, other than: You read it correctly? 10:10:35AM 15 Q. What are you saying -- 16 A. It's not right. It's not -- at least when he puts 17 it out to his peers, other than to his roommate in college, 18 it's not what he says in the published paper. So I don't 19 know what you want me to say here. 10:10:51AM 20 Q. Let me make sure I understand. What are you 21 saying is in his published paper that is inconsistent with 22 this? 23 A. He doesn't say anything like this. He says to use 24 1.560 to have it in the range of the refractive indices that 10:11:07AM 25 you're seeing. But he says in his published paper that</p>	<p style="text-align: right;">Page 49</p> <p>10:13:25AM 1 this is identifying talc, but then let me look -- let's look 2 at the next slide, and then we can compare them. 3 A. So we got 1.595. 4 Q. Okay. So this -- 10:13:37AM 5 A. Well, that's -- that's saying 1.560. So you'll 6 get -- 7 Q. Right. 8 A. -- these colors. 9 Q. Okay. Now, I just want to -- this is a 10:13:45AM 10 representative image from your analysis of this more recent 11 bottle. And now we're in 1560. Right? 12 A. Correct. 13 Q. Okay. Next slide. 14 So if 1560 pushes colors towards the orange, away 10:14:16AM 15 from the brighter yellows, I assume it relates to what you 16 said before. Why is it that your new images are brighter 17 than your old images? 18 A. Well, you realize that the one on the left-hand 19 side, we're looking at talc? 10:14:37AM 20 The one on the right-hand side, we're looking at 21 chrysotile. 22 Q. Okay. Why is it brighter? 23 First of all, this is not the background here. 24 This is a bottle of Johnson &amp; Johnson. Right? That you're 10:14:54AM 25 analyzing.</p>



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<p>10:14:55AM 1 <b>A. Is that the one we just did?</b></p> <p>2 Q. This is -- yeah, from the Valadez report. That's</p> <p>3 a Valadez, Johnson &amp; Johnson.</p> <p>4 <b>A. You're using a completely different microscope.</b></p> <p>10:15:06AM 5 Q. Okay.</p> <p>6 <b>A. -- with an LED lighting. That is the bright white</b></p> <p>7 <b>area. And this is the old microscope. They're going to</b></p> <p>8 <b>look different.</b></p> <p>9 Q. Okay. So does the one on the right look more true</p> <p>10:15:19AM 10 to what the eye would see under the microscope than the one</p> <p>11 on the left?</p> <p>12 <b>A. The one on the left is what the eye would see.</b></p> <p>13 <b>The one on the right is what the eye would see on your</b></p> <p>14 <b>brightness level. You know, you're looking at a</b></p> <p>10:15:44AM 15 <b>state-of-art LED different objective -- different dispersion</b></p> <p>16 <b>staining-type lens. It's the infinity-type, so you can't</b></p> <p>17 <b>really compare them. If you're trying to compare them as</b></p> <p>18 <b>the exact same color, you can't do that. Or the</b></p> <p>19 <b>brightness --</b></p> <p>10:16:05AM 20 <b>But we have -- and, you know, I guess we'll get to</b></p> <p>21 <b>it. I've produced samples where we have half chrysotile and</b></p> <p>22 <b>half fibrous talc with the same microscope on the left-hand</b></p> <p>23 <b>side and you're getting similar types of brightness, but you</b></p> <p>24 <b>can clearly see -- same background, but you can clearly see</b></p> <p>10:16:33AM 25 <b>how the talc -- fibrous talc side is way brighter than</b></p>	<p>10:18:21AM 1 <b>A. Not on a talc plate, no, because it doesn't</b></p> <p>2 <b>change. Talc plate only -- you're going into the B</b></p> <p>3 <b>directions, which is the top flat direction. And no matter</b></p> <p>4 <b>which way you turn it, you're going to pretty much get</b></p> <p>10:18:40AM 5 <b>similar stuff.</b></p> <p>6 Q. Have you seen the video of Dr. Sanchez flipping a</p> <p>7 talc plate?</p> <p>8 <b>A. Flipping it how?</b></p> <p>9 <b>The answer is, no, I haven't seen it.</b></p> <p>10:18:50AM 10 Q. Yeah, okay.</p> <p>11 But anyway, so, for example, if we look at some of</p> <p>12 these yellow -- like if I travel with my eye up from the</p> <p>13 particle you have identified as chrysotile up towards my</p> <p>14 left and up, there's like a -- you know, is that talc, that</p> <p>10:19:12AM 15 yellow piece?</p> <p>16 <b>A. Don't know.</b></p> <p>17 Q. Okay.</p> <p>18 <b>A. Could be. Probably.</b></p> <p>19 Q. Okay. How does that structure that you've</p> <p>10:19:26AM 20 identified as chrysotile look any different than -- in that</p> <p>21 orientation, look any different than those talc plates?</p> <p>22 <b>A. Looks completely different to me. It doesn't have</b></p> <p>23 <b>the morphology. You know, you have to understand, this is</b></p> <p>24 <b>Step 1 out of 5 steps of different orientation, elongation,</b></p> <p>10:19:54AM 25 <b>cross polars, no polars.</b></p>
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<p>10:16:39AM 1 <b>different refractive indices than you see on the chrysotile</b></p> <p>2 <b>side. So what you're trying to compare makes no sense.</b></p> <p>3 Q. We'll talk more about these images in a second.</p> <p>4 So we're looking here at a structure that you've identified</p> <p>10:16:56AM 5 as chrysotile. Right? With the arrows.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Okay. And then these more rounded structures</p> <p>8 around it, are those talc plates?</p> <p>9 <b>A. Well, you have talc plates, and you have something</b></p> <p>10:17:17AM 10 <b>else in there. Maybe aluminum silicates or some silica, but</b></p> <p>11 <b>the -- the other, the blues.</b></p> <p>12 <b>And then you have talc particles in there.</b></p> <p>13 Q. Okay. So let me make sure I understand. The</p> <p>14 blues, you think, are -- some material is neither talc</p> <p>10:17:39AM 15 nor asbestos. Right?</p> <p>16 <b>A. Well, some of them may be asbestos. It's just too</b></p> <p>17 <b>small to -- for us to resolve, especially the ones that are</b></p> <p>18 <b>in the perpendicular directions, blue.</b></p> <p>19 <b>And then you have some particulates that are, you</b></p> <p>10:18:01AM 20 <b>know -- fragments of something. I don't know what it is.</b></p> <p>21 <b>We don't analyze and try to determine everything that's in</b></p> <p>22 <b>these samples. Could be silica, or it could be something</b></p> <p>23 <b>else. I don't know.</b></p> <p>24 Q. You can get blue on a -- even on a talc plate</p> <p>10:18:17AM 25 depending on how it's oriented. Right?</p>	<p>10:19:57AM 1 <b>No decision is made that that a chrysotile bundle</b></p> <p>2 <b>until we get through the whole thing. We can't just pick</b></p> <p>3 <b>one photograph and say, how's it different from here? How's</b></p> <p>4 <b>it different from here. You know, if we go -- look through</b></p> <p>10:20:12AM 5 <b>all the photographs, which would be how you probably</b></p> <p>6 <b>identify chrysotile, you can start -- you can see all</b></p> <p>7 <b>the difference with that.</b></p> <p>8 <b>But you're just asking, how is that different?</b></p> <p>9 <b>You know, I can't -- let me see here.</b></p> <p>10:20:34AM 10 <b>Let me get that. What's that number?</b></p> <p>11 Q. Page 33.</p> <p>12 <b>A. If you go to the parallel direction and look at</b></p> <p>13 <b>those same particles, you can see a big difference. If you</b></p> <p>14 <b>go to elongation, most of those -- that's a 630. Under</b></p> <p>10:21:21AM 15 <b>elongation, talc plates pretty much disappear.</b></p> <p>16 <b>Then if you go to cross-polars you can see the</b></p> <p>17 <b>fibrous structure.</b></p> <p>18 <b>So it's -- if I can look through this and see</b></p> <p>19 <b>how -- it is chrysotile versus a talc plate.</b></p> <p>10:21:56AM 20 Q. Explain to me how you think that's chrysotile and</p> <p>21 not talc.</p> <p>22 <b>A. If you go to the next photograph in the</b></p> <p>23 <b>perpendicular direction, you can see the striations through</b></p> <p>24 <b>it. It's almost purplish-blue. It's just about at its</b></p> <p>10:22:21AM 25 <b>extinction limit, and there's -- I can see that out of a lot</b></p>

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<p style="text-align: right;">Page 54</p> <p>10:22:24AM 1 of these other ones which are too small to really resolve.  2 Then and I go to the elongation photograph, I can  3 see that there's a talc plate. I can see that it has  4 fibrous structure. And if I go to cross-polars, I can see  10:22:46AM 5 the fibrous nature of it.  6 So it's chrysotile. It's not a talc plate. We're  7 not misidentifying -- we're not misidentifying this as  8 fibrous talc, and we're not misidentifying talc plates for  9 chrysotile.  10:23:03AM 10 Q. What in the images in the elongation would be  11 different that we're seeing here versus what you're calling  12 fibrous talc? What are we seeing here that we could not see  13 with what you're calling fibrous talc?  14 A. Well, again, we're not just -- first, I thought we  10:23:28AM 15 were comparing them to talc plates.  16 Q. Okay. I'm just asking --  17 A. Well, if we go back to the dispersion staining,  18 the -- the refractive indices is 1.564. In the -- in the  19 parallel, it is 1.561 in the perpendicular. The reason it's  10:23:55AM 20 not fibrous talc because you got a refractive indice of  21 0.003, where the fibrous talc is going to have a refractive  22 indice that is completely different.  23 For example, if you go over to the right slightly,  24 there's a white spot there. I don't know what that is. And  10:24:24AM 25 if I were to go a couple -- maybe 5 millimeters to the right</p>	<p style="text-align: right;">Page 56</p> <p>10:26:49AM 1 MR. DUBIN: On the right, yeah.  2 MR. RIVAMONTE: Okay. Yeah.  3 MR. DUBIN: I'm not sure if it has page numbers or  4 we just counted pages.  10:27:07AM 5 MR. RIVAMONTE: I'm just looking at the PDF,  6 whatever the PDF says. It's page 32.  7 Q. (BY MR. DUBIN:) Sorry, Doctor, I wasn't sure if  8 you were in the middle of --  9 A. Yeah, I heard it. I'm just looking at it. It's  10:27:20AM 10 hard to say, what is that? What is that?  11 I mean I'd have to be looking in the microscope at  12 it to tell you what that is. It's not something we  13 identified. So I don't know what's wrong with it, but I'd  14 have to be looking in the PLM scope to make a guess.  10:27:37AM 15 Q. Based on morphology, does that to appear to be a  16 talc plate?  17 A. Again, I'd have to be looking in the microscope to  18 make any decision on what that might be.  19 Q. And is that generally true? In order to properly  10:27:54AM 20 judge what colors were observed on here, you would have to  21 be at the microscope and actually look at the slide?  22 A. It's not so much the colors. It's the focus.  23 It's -- you know, I would look at elongation, at lower  24 magnification. So got kind of an oddball structure to it to  10:28:22AM 25 be chrysotile. I don't -- doesn't really have substantially</p>
<p style="text-align: right;">Page 55</p> <p>10:24:29AM 1 and straight up, you see a very yellow-looking structure.  2 And I can see structures in that.  3 And then if I go to the parallel, I can see this  4 brightish -- bright white and a bright blue. That's fibrous  10:24:49AM 5 talc.  6 And tell me, if you can absolutely see the  7 difference there.  8 Q. Okay. Talc in perpendicular can also be blue.  9 Right?  10:25:11AM 10 A. Fibrous talc in the perpendicular can be blue.  11 But if you compare -- if you go to the  12 perpendicular photograph, which would be the next one where  13 I said, that's talc. And look at it in the perpendicular --  14 it's not quite on perpendicular -- it's bright -- light,  10:25:31AM 15 bright blue to white. So that white puts it less than  16 1.535.  17 Q. So what is the structure to the right of the one  18 that you've identified, the larger blocky structure with  19 blue on the side? What is that it? Looks like it's mostly  10:25:53AM 20 in perpendicular.  21 A. I just have to get oriented here, so give me a  22 second.  23 MR. RIVAMONTE: Mr. Dubin, I just want to clarify.  24 The image that we're currently looking at now is page 32 of  10:26:44AM 25 Dr. Longo's report, the parallel dispersion?</p>	<p style="text-align: right;">Page 57</p> <p>10:28:34AM 1 parallel sides.  2 So I can't really tell you anything else than  3 what's in the middle there because we have parallel sides.  4 I see the striations, you know, all the way through it. It  10:28:51AM 5 has the appropriate refractive indices. So it's --  6 I would have to do more to that other particle in  7 order to say, that's chrysotile. I don't see the striations  8 through it like I do the other one. It's -- I can't tell  9 you without doing more work.  10:29:14AM 10 Q. Do you still have the PLM slides for this  11 analysis?  12 A. We still do.  13 Q. Okay. I'm going to request that you preserve  14 those and we're going to request an opportunity to review  10:29:27AM 15 them, so we can -- we'll follow up about that, but I am  16 requesting that you not dispose of them.  17 The -- let's go -- so what in this oil, in 1560,  18 what should you be seeing for chrysotile for the kind of  19 chrysotile that you say is in cosmetic talc? What should  10:29:50AM 20 you be seeing, colors?  21 A. What you're seeing right there.  22 Q. Okay.  23 A. So a range, looks like everything. But we're  24 seeing the same sort of refractive indices. This one is  10:30:04AM 25 1.564. I would say 90 of what we find for chrysotile in</p>



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<p style="text-align: right;">Page 58</p> <p>10:30:11AM 1 <b>cosmetic talc is in the 1.560 to the 1.569 range.</b></p> <p>2 <b>And if you were to average it out, it's about</b></p> <p>3 <b>1.566 or so. That what's we see, the primary in elongation.</b></p> <p>4 Q. Not generally bright yellow. Right?</p> <p>10:30:31AM 5 <b>A. Not at 1.560.</b></p> <p>6 <b>And it wouldn't call it bright. I would just call</b></p> <p>7 <b>it a yellowish-gold.</b></p> <p>8 Q. Okay. And with respect to what all these blue</p> <p>9 things are, the percentage of chrysotile that you say you</p> <p>10 identified in these products is down around .003 to</p> <p>11 .006 percent. Right?</p> <p>12 <b>A. Well, what we saw here was 0.002 to 0.004. When</b></p> <p>13 <b>it was weight corrected, I think it was like .000 -- let</b></p> <p>14 <b>me just look at the report. I don't want to put something</b></p> <p>15 <b>on the record that's not . . . Okay. 0.0003 to</b></p> <p>16 <b>0.0006 percent.</b></p> <p>17 Q. At those percentages, is it fair to say that in</p> <p>18 this field, most of the material is not going to be</p> <p>19 chrysotile?</p> <p>10:32:06AM 20 <b>A. I think we have found something to agree on,</b></p> <p>21 <b>Mr. Dubin.</b></p> <p>22 Q. Okay. So talk to me for a second about your</p> <p>23 Calidria reference SU210 in 1560. But first, let me just</p> <p>24 ask you: Was --</p> <p>10:32:39AM 25 Well, actually, I'll get to that later. Let's</p>	<p style="text-align: right;">Page 60</p> <p>10:34:21AM 1 <b>A. Oh, the talc plates?</b></p> <p>2 Q. Yeah. Are you seeing that same yellow on the talc</p> <p>3 plates?</p> <p>4 <b>A. I don't think that's the same color.</b></p> <p>10:34:29AM 5 Q. You don't think that that yellow is the same color</p> <p>6 that you're seeing in the talc plates near it?</p> <p>7 <b>A. I'm sorry. Could you repeat that?</b></p> <p>8 Q. You don't think that yellow is the same color as</p> <p>9 the talc plates that you're seeing in this image?</p> <p>10:34:43AM 10 <b>A. No. I don't.</b></p> <p>11 Q. In fact, it's brighter looking than some of the</p> <p>12 talc plates?</p> <p>13 <b>A. I would say it's a different shade.</b></p> <p>14 Q. Okay. Well, let's see what shade you did call it.</p> <p>10:34:56AM 15 So you give a value of 1570. Right?</p> <p>16 <b>A. That's right.</b></p> <p>17 Q. Okay. And we can go forward one slide, and we'll</p> <p>18 come back.</p> <p>19 So the way we do this -- I mean, your lab is at</p> <p>10:35:18AM 20 what temperature? About 22, you said?</p> <p>21 <b>A. 21 degrees centigrade.</b></p> <p>22 Q. 21. Okay. So we would look 1570, 21 degrees,</p> <p>23 1560 oil, and it gives us a value of 500. Right?</p> <p>24 <b>A. Yes. That's -- I guess, that's the old Su tables,</b></p> <p>10:35:48AM 25 <b>but 1.570 ought to be about 500.</b></p>
<p style="text-align: right;">Page 59</p> <p>10:32:42AM 1 just do this first.</p> <p>2 So I've got an image here. If we go to the next</p> <p>3 from what I've received in morning. And -- so we understand</p> <p>4 again, this is what you're using as your reference from</p> <p>10:33:06AM 5 Calidria chrysotile in 1560 oil, the same oil that you're</p> <p>6 using for the Valadez bottles. Right?</p> <p>7 <b>A. Oh, you're pulling it up. Okay. I couldn't</b></p> <p>8 <b>figure out -- where did that come from?</b></p> <p>9 Q. Yeah, page 21.</p> <p>10:33:26AM 10 <b>A. Yes, that's what we're using.</b></p> <p>11 Q. And so this is structure, in this Calidria</p> <p>12 reference, that you've identified as being chrysotile.</p> <p>13 Correct?</p> <p>14 <b>A. Yes, sir. It is chrysotile.</b></p> <p>10:33:39AM 15 Q. Okay. So, as we point out, there's also talc in</p> <p>16 this reference sample. Right?</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. Okay. Is that bright yellow?</p> <p>19 <b>A. No. I would say that's sort of a goldish-brown --</b></p> <p>10:33:54AM 20 <b>a goldish area. It's not bright yellow at all.</b></p> <p>21 Q. Okay. Is this the color that you are -- is this</p> <p>22 color in your view in parallel inconsistent with talc?</p> <p>23 <b>A. Oh, totally.</b></p> <p>24 Q. Is it the same color that you're seeing on the</p> <p>10:34:19AM 25 talc plates?</p>	<p style="text-align: right;">Page 61</p> <p>10:35:52AM 1 Q. Okay. Now let's go back one slide, back to 26.</p> <p>2 And so 500, the color that we should be observing is the one</p> <p>3 underneath the 500. Right?</p> <p>4 <b>A. It should be close to that.</b></p> <p>10:36:07AM 5 Q. Are you honestly telling me that when you look at</p> <p>6 this image, that structure is that magenta color underneath</p> <p>7 500?</p> <p>8 <b>A. Well, no.</b></p> <p>9 MR. RIVAMONTE: Argumentative.</p> <p>10:36:22AM 10 THE WITNESS: I'm not saying that. That magenta</p> <p>11 color under 500 -- ours is more in the 1.572 -- you know, if</p> <p>12 these are -- if he's correct. I got to go back to his</p> <p>13 tables, and we're using the tables he has in his</p> <p>14 publication. And I'd be looking at -- let me take look at</p> <p>10:36:49AM 15 that.</p> <p>16 Oh, I'm looking at the chrysotile. No wonder.</p> <p>17 Need to be looking at the talc that we analyzed. Where is</p> <p>18 that? You're looking at the standard. No wonder. There it</p> <p>19 is.</p> <p>10:38:57AM 20 No, we have sort of that at the 500 mark. Again,</p> <p>21 I'd have to be under the microscope to look at it, but the</p> <p>22 outer edge, I think that was averaged. But I think that's</p> <p>23 what you're using is from one of his older Su tables maybe.</p> <p>24 But I don't have a problem with -- the whole thing is not</p> <p>10:39:27AM 25 looking this magenta -- redder-ish [sic] purple.</p>

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<p style="text-align: right;">Page 62</p> <p>10:39:30AM 1 But on the outer edge, on the top of the structure</p> <p>2 it has where the Becke line is. So I'm not concerned with</p> <p>3 that.</p> <p>4 Q. Can you see anything -- again, see this little</p> <p>10:39:39AM 5 particle, this yellow particle, the talc plate in between</p> <p>6 these blue structures to the right of what you've mark off?</p> <p>7 See those talc plates?</p> <p>8 <b>A. I do.</b></p> <p>9 Q. Is there some difference that you're -- you're</p> <p>10:39:57AM 10 seeing there that causes you to call this magenta and --</p> <p>11 <b>A. No, I'm not saying the whole thing is magenta.</b></p> <p>12 <b>What we're doing now is we're averaging them. It's hard to</b></p> <p>13 <b>see where you haven't blown it up.</b></p> <p>14 <b>But on the top edge, we have a little bit</b></p> <p>10:40:19AM 15 <b>different color there. So I'd have to go and look at -- and</b></p> <p>16 <b>see if this was averaged out on it. Because at least on my</b></p> <p>17 <b>photograph, I can see on that top edge where the Becke line</b></p> <p>18 <b>is.</b></p> <p>19 Q. Okay. Let's go forward to more slides.</p> <p>10:40:42AM 20 To that one, yeah.</p> <p>21 So again, what we've -- we've already talking</p> <p>22 about this. Let's go one more. Okay.</p> <p>23 What color are you seeing here in this structure</p> <p>24 that you've identified as chrysotile?</p> <p>10:41:12AM 25 <b>A. Is this the new one?</b></p>	<p style="text-align: right;">Page 64</p> <p>10:43:05AM 1 <b>A. Purple, purplish-red.</b></p> <p>2 Q. Okay?</p> <p>3 <b>A. That's what I'm seeing on the outer edge, not the</b></p> <p>4 <b>whole structure.</b></p> <p>10:43:13AM 5 Q. Okay. So is it -- you're understanding then that</p> <p>6 this chrysotile, it's going to be all yellow -- and it's</p> <p>7 going to be yellow and then some faint line of purple on the</p> <p>8 outside or something like that? That's what you're seeing</p> <p>9 here?</p> <p>10:43:38AM 10 <b>A. What are you -- I'm not sure what you're talking</b></p> <p>11 <b>about. I see no yellow on that chrysotile structure. What</b></p> <p>12 <b>I'm looking at is the outer edge of the bundle.</b></p> <p>13 Q. Uh-huh. Okay. So let's keep going. But you're</p> <p>14 treating this -- for purposes of your birefringence</p> <p>10:44:00AM 15 calculation, you're treating this -- the number that goes</p> <p>16 into your calculation is associated with purple?</p> <p>17 <b>A. Now, that's what it looks like to me, sitting</b></p> <p>18 <b>here. Again, you know, I'd have to be sitting at the PLM</b></p> <p>19 <b>scope, but I can see a reddish-purple around the edge, what</b></p> <p>10:44:22AM 20 <b>I'm looking at right now.</b></p> <p>21 Q. You can't see -- because, again -- because of the</p> <p>22 illumination, you can't see that also -- a little bit of an</p> <p>23 edge around the talc plate up there?</p> <p>24 <b>A. What I see around that talc plate is reds and</b></p> <p>10:44:38AM 25 <b>yellows.</b></p>
<p style="text-align: right;">Page 63</p> <p>10:41:15AM 1 Q. Yep. That's the same structure we were looking at</p> <p>2 before.</p> <p>3 <b>A. I'm going to --</b></p> <p>4 Q. Sure.</p> <p>10:41:22AM 5 <b>A. -- look at my photograph.</b></p> <p>6 Q. Look at your photograph.</p> <p>7 <b>A. It looks like almost a purple around the Becke</b></p> <p>8 <b>lines.</b></p> <p>9 Q. Okay. So first, let me make sure I'm</p> <p>10:41:57AM 10 understanding. The structures above it, so, say, for</p> <p>11 example, to the left of the top of the arrows, that's a talc</p> <p>12 plate. Right?</p> <p>13 <b>A. Yep.</b></p> <p>14 Q. Okay. And so you're telling me that the structure</p> <p>10:42:12AM 15 that we're looking at here, you would characterize that as</p> <p>16 purple, the one that you're calling chrysotile?</p> <p>17 <b>A. I'm not talking about the structure. I'm talking</b></p> <p>18 <b>about the very outside of the bundle where you're supposed</b></p> <p>19 <b>to be determining you're refractive indices.</b></p> <p>10:42:32AM 20 <b>I'm not talking about the whole structure. I'm</b></p> <p>21 <b>talking about where you make the call on this as -- as</b></p> <p>22 <b>discussed in Dr. Su's published paper.</b></p> <p>23 Q. Okay. Just so we're clear here, the 1564 is the</p> <p>24 refractive indices that you give for this. And so 1564,</p> <p>10:42:59AM 25 that's structure should be purple. Right?</p>	<p style="text-align: right;">Page 65</p> <p>10:44:39AM 1 Q. Okay. So you would characterize the talc plate as</p> <p>2 red and yellow, red on the outside?</p> <p>3 <b>A. Looking at the bottom of it, it's sort of a darker</b></p> <p>4 <b>red. And then you also see areas that are yellow, and then</b></p> <p>10:44:54AM 5 <b>you have some areas on the very backside.</b></p> <p>6 Q. So talc -- sorry.</p> <p>7 <b>A. I don't see any structures inside that talc plate.</b></p> <p>8 Q. But you're saying --</p> <p>9 (Simultaneous speaking.)</p> <p>10:45:11AM 10 <b>A. -- different color, a different -- different</b></p> <p>11 <b>colors than what we're looking at, at the chrysotile bundle.</b></p> <p>12 Q. But you're saying a talc plate can also have that</p> <p>13 sort of reddish outside in those images. Right?</p> <p>14 <b>A. Well, what I'm saying is, it's different than what</b></p> <p>10:45:29AM 15 <b>you're pointing to.</b></p> <p>16 Q. But it can have like what you're seeing as a</p> <p>17 reddish outline in these images, the talc plate?</p> <p>18 <b>A. Well, what is see is yellow, a little bit of red</b></p> <p>19 <b>area, I see a little bit of blue area, and then I see in the</b></p> <p>10:45:47AM 20 <b>very front -- well, that's in the parallel -- perpin- --</b></p> <p>21 <b>Then I see a little bit of red, but I don't see</b></p> <p>22 <b>the shade of the reddish-purple that I see around the</b></p> <p>23 <b>chrysotile one. Again, I'm not looking through the</b></p> <p>24 <b>microscope, but trying to answer your question.</b></p> <p>10:46:03AM 25 Q. Yeah. So let's go ahead a little bit. We can</p>

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<p>10:46:06AM 1 skip to the -- let's to 30 for a second.</p> <p>2 The next one.</p> <p>3 So the number you're assigning to that structure</p> <p>4 that we looked at before in parallel is actually even more</p> <p>10:46:32AM 5 dark purple than the ISO reference chrysotiles. Right?</p> <p>6 <b>A. Well, you've got all kinds of colors there.</b></p> <p>7 <b>You've got bright yellow, you've got some blues in there,</b></p> <p>8 <b>you've got some magenta. And of course, we're in 1.550,</b></p> <p>9 <b>here. I don't believe this is 1.560, so you can't compare</b></p> <p>10:47:07AM 10 <b>the two.</b></p> <p>11 Q. I know, but just in terms of the visual color</p> <p>12 where it goes on the wavelength. On the wavelength, you're</p> <p>13 saying that that structure in Johnson &amp; Johnson is are more</p> <p>14 purple than this?</p> <p>10:47:23AM 15 <b>A. That's not purple.</b></p> <p>16 Q. Okay. Well, you're saying it's farther towards</p> <p>17 the purple range than this. Correct?</p> <p>18 <b>A. Well, you can't compare the colors. This is in</b></p> <p>19 <b>1.550. We're looking at 1.560.</b></p> <p>10:47:40AM 20 Q. What I'm asking you is: The colors are associated</p> <p>21 with wavelengths. Right? In both circumstances. Right?</p> <p>22 <b>A. They're associated with wavelengths, but the 1.560</b></p> <p>23 <b>changes that wavelength even though you will get the same</b></p> <p>24 <b>refractive indices because you have to look at a 1.560. I'm</b></p> <p>10:48:05AM 25 <b>not -- you can't -- you can't look at this in 1.560 and then</b></p>	<p>10:49:46AM 1 <b>that is maybe 1 thousandths of a size of what we're looking</b></p> <p>2 <b>at over there and looking at it in a completely different</b></p> <p>3 <b>refractive indice [sic] fluid. So, yeah. You can do what</b></p> <p>4 <b>you want here, but I'm not agreeing -- I'm not saying you</b></p> <p>10:50:02AM 5 <b>can compare the two at all. It's not the structure that</b></p> <p>6 <b>we're dealing with here.</b></p> <p>7 Q. Okay. Let's go to Slide 33. And so here you're</p> <p>8 reporting this and including it in your calculations as</p> <p>9 1568. Right? So magenta. Right?</p> <p>10:50:45AM 10 <b>A. We're saying the 1.568 due to what's around the</b></p> <p>11 <b>outer edge of that bundle.</b></p> <p>12 Q. For purposes of your calculation that you're using</p> <p>13 this to determine this being chrysotile, you're treating</p> <p>14 this as magenta. Right?</p> <p>10:51:02AM 15 <b>A. I'm treating it somewhere -- you can't really do</b></p> <p>16 <b>it like that. I'm treating it somewhere in there, and I</b></p> <p>17 <b>need to check out --</b></p> <p>18 <b>I need to check the table you're using.</b></p> <p>19 <b>But I can see here, looking at it on the outer</b></p> <p>10:51:17AM 20 <b>edge, it's pretty -- pretty close between the two. They're</b></p> <p>21 <b>1.572 to 1.573 to the 1.569 to the 1. -- the 1.567 to 1.568</b></p> <p>22 <b>verses the 1.69. [sic]</b></p> <p>23 <b>You're only -- you got a few-thousandths of a</b></p> <p>24 <b>refractive indice here. You know, looking at a very small</b></p> <p>10:51:46AM 25 <b>structure and I'm just on the outer edge.</b></p>
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<p>10:48:11AM 1 <b>try to compare -- 1.550 and try to compare to 1.560.</b></p> <p>2 Q. I'm just talking about the color, the color</p> <p>3 itself. Right? The color of this is -- you're saying</p> <p>4 visually whatever oil it's in, that the structure we just</p> <p>10:48:31AM 5 looked at from the Johnson &amp; Johnson is further towards</p> <p>6 purple than this. Right?</p> <p>7 MR. RIVAMONTE: Asked and answered.</p> <p>8 THE WITNESS: You can't compare the two.</p> <p>9 And, yes, it's a darker reddish-purple than, you</p> <p>10:48:52AM 10 know, this magenta color eliminating the bright yellow</p> <p>11 colors and ignoring the size of structure under that, that</p> <p>12 is probably closer -- is more closer to the size ranges</p> <p>13 we're seeing.</p> <p>14 So, yeah. You just can't compare the two. I told</p> <p>10:49:12AM 15 you my opinion about it and what was around the edge, and</p> <p>16 I'm not looking in a microscope. I can't answer it anymore</p> <p>17 and help you out here.</p> <p>18 Q. Just so we're clear what I'm asking about, I'm</p> <p>19 comparing the color of this to -- go back a couple of</p> <p>10:49:28AM 20 slides, please -- and this. These are the two ones I was</p> <p>21 asking you about. Right?</p> <p>22 <b>A. That's so misleading, Mr. Dubin.</b></p> <p>23 Q. Well --</p> <p>24 <b>A. You're talking about the whole structure. I'm</b></p> <p>10:49:42AM 25 <b>talking about right around the Becke line of a structure</b></p>	<p>10:51:47AM 1 <b>So you are trying to compare to the 1866b standard</b></p> <p>2 <b>in huge bundle. You just can't do that.</b></p> <p>3 Q. I thought you told me before you saw a little red</p> <p>4 sometimes on the outside of talc plate. So how is that</p> <p>10:52:03AM 5 any different than what you're seeing here?</p> <p>6 <b>A. It's completely different. I didn't say it was</b></p> <p>7 <b>the same thing. And I don't see any talc plates in this one</b></p> <p>8 <b>that even comes close.</b></p> <p>9 Q. Why are the talc plates so dark here? Why can't I</p> <p>10:52:22AM 10 see the other talc structures, as well as this one?</p> <p>11 <b>A. It's a different area of the sample.</b></p> <p>12 Q. What causes things to be obscured like that?</p> <p>13 MR. RIVAMONTE: Misstates testimony. Vague and</p> <p>14 overbroad.</p> <p>10:52:52AM 15 THE WITNESS: You're just seeing a more -- you're</p> <p>16 seeing more of a concentrated area on the sample. If I look</p> <p>17 at individual structures of talc plates versus -- it's less</p> <p>18 concentrated of talc particles.</p> <p>19 Q. (BY MR. DUBIN:) I don't understand. How is -- but</p> <p>10:53:09AM 20 then why can't I see the talc particles that are on here</p> <p>21 clearly. Why can't I see --</p> <p>22 For example, why are the ones, down and to the</p> <p>23 left, so dark?</p> <p>24 <b>A. If I look through -- if I look through the one</b></p> <p>10:53:31AM 25 <b>that you say is so much better and I look through this one,</b></p>

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<p>10:53:36AM 1 I can find some of the top plates are just like that.</p> <p>2 And also I can find a lot of top plates that are</p> <p>3 not -- are just like the others. You're looking -- you're</p> <p>4 looking down through a glass slide onto a sample that is</p> <p>10:53:50AM 5 basically just particulates -- in with the -- in with the</p> <p>6 fluid, you're going to have different heights.</p> <p>7 And the only thing that they're focusing in on to</p> <p>8 make sure that it's absolutely in focus is the structure</p> <p>9 we're looking at. You know, you're point of view -- even --</p> <p>10:54:15AM 10 and we're also using a -- using the --</p> <p>11 The central stop objective lens is also one of</p> <p>12 these infinity lenses, which gives you a broader -- where</p> <p>13 you're going to see more structure. And this could be up</p> <p>14 and you can have other particles down on the glass slide.</p> <p>10:54:35AM 15 This is common in polarized light microscopy where, if this</p> <p>16 was somewhere else and I wanted to not focus on what's</p> <p>17 important but focus on one of these other particles like</p> <p>18 over here, you know, there's more of these particle that are</p> <p>19 in the same plain view with the central stop lens -- that's</p> <p>10:54:56AM 20 the infinity type. This is common.</p> <p>21 Q. Okay. Have you reviewed -- received or reviewed</p> <p>22 Dr. Gunter's supplemental report about the optical</p> <p>23 properties of Calidria 210 and 144 chrysotile, as compared</p> <p>24 to Gold Bond elongated talc?</p> <p>10:55:24AM 25 A. Yes.</p>	<p>10:57:01AM 1 A. Yes.</p> <p>2 Q. Okay. When you analyzed -- when you've analyzed</p> <p>3 Johnson &amp; Johnson product in the 1560 liquid, did you see</p> <p>4 any chrysotile structures that -- any structures that you're</p> <p>10:57:26AM 5 calling chrysotile that were blue in parallel?</p> <p>6 A. No.</p> <p>7 Of course that's 1.565, not 1.560.</p> <p>8 Q. Have you done -- how did you decide to pick 1560</p> <p>9 if Dr. Su's statement was that you should pick something</p> <p>10:57:57AM 10 between -- in the range of 1560 to 1570? How did you decide</p> <p>11 on 1560?</p> <p>12 A. Because the 1.560 is in the range that we're</p> <p>13 seeing.</p> <p>14 Two, what I noticed here, he hasn't given us any</p> <p>10:58:21AM 15 refractive indices because there's no chart for 1.565.</p> <p>16 So we picked 1.560 because that's what Su said to</p> <p>17 do in his published paper, that we should use 1.550, slash,</p> <p>18 1.560 in his chart -- his wavelength charts -- where</p> <p>19 refractive indices stops at 1.560.</p> <p>10:58:48AM 20 MR. DUBIN: Okay.</p> <p>21 All right. We can take down the slide set.</p> <p>22 So I'm going to change topics now and hopefully</p> <p>23 speed along a little bit.</p> <p>24 But I don't know whether you want to take another</p> <p>10:59:03AM 25 break, whether you need anything to eat, or something like</p>
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<p>10:55:25AM 1 Well, I don't know if I reviewed the report. I</p> <p>2 reviewed his deposition where he said it was yellow-gold.</p> <p>3 Q. Well, I just want to make sure you --</p> <p>4 Let me look at one image from that. We'll make it</p> <p>10:55:39AM 5 the next exhibit in order.</p> <p>6 (Exhibit 7 was subsequently marked for</p> <p>7 identification.)</p> <p>8 Q. (BY MR. DUBIN:) So this is -- trying to exemplify</p> <p>9 this 155 versus -- he is using 1565 instead of 1560, just so</p> <p>10:56:00AM 10 we make sure we understand the concept here.</p> <p>11 So you can see that the top image is in 1552, and</p> <p>12 then the bottom image is in 1565.</p> <p>13 And the point is that if you -- when you raise the</p> <p>14 refractive indices of the oil, now you will see chrysotile</p> <p>10:56:26AM 15 as blue in parallel. Right? Is that a correct summary of</p> <p>16 this?</p> <p>17 A. Correct.</p> <p>18 MR. RIVAMONTE: Vague and overbroad.</p> <p>19 Q. (BY MR. DUBIN:) I'm sorry, what? "Correct"?</p> <p>10:56:41AM 20 A. So it's initially in what? 1.552?</p> <p>21 Q. Right.</p> <p>22 A. And now it's 1.565, okay.</p> <p>23 Q. And --</p> <p>24 A. The point is what?</p> <p>10:56:54AM 25 Q. The chrysotile has turned to be blue in parallel?</p>	<p>10:59:06AM 1 that.</p> <p>2 THE WITNESS: Yeah. It's about 1:00. I do need</p> <p>3 lunch.</p> <p>4 MR. DUBIN: Okay. Let's go off the --</p> <p>10:59:09AM 5 (Simultaneous speaking.)</p> <p>6 THE WITNESS: -- go till 5:00 p.m. today. I don't</p> <p>7 know if you're going to need all that time or not.</p> <p>8 MR. DUBIN: Let's go off the record, and we can</p> <p>9 discuss how long to take for lunch.</p> <p>10:59:19AM 10 VIDEOGRAPHER: The time is 9:59 a.m., Pacific</p> <p>11 Time, and we're off the record.</p> <p>12 This marks the end of Media II.</p> <p>13 (Off the record at 12:59 p.m., and record resumes</p> <p>14 at 1:49 p.m., EST)</p> <p>11:49:04AM 15 VIDEOGRAPHER: The time is 10:49 a.m., Pacific</p> <p>16 Time, and we're back on the record. This marks the</p> <p>17 beginning of Media III.</p> <p>18 MR. DUBIN: Before I do anything else, I just want</p> <p>19 to clean up the exhibits.</p> <p>11:49:18AM 20 So Exhibit 1 will be the notice.</p> <p>21 Exhibit 2 will be the Calidria SG210 references in</p> <p>22 1560 oil.</p> <p>23 Exhibit 3 is the Su affidavit.</p> <p>24 Exhibit 4 will be the slides that I displayed.</p> <p>11:49:33AM 25 Exhibit 5 will be the Valadez report.</p>

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<p>10:55:45AM 1 (Exhibit No. 5 was marked for identification.)</p> <p>2 MR. DUBIN: Exhibit 6 will be the older Chinese</p> <p>3 Johnson &amp; Johnson -- Chinese-sourced Johnson &amp; Johnson</p> <p>4 report that I displayed some images from.</p> <p>10:55:45AM 5 (Exhibit No. 6 was marked for identification.)</p> <p>6 MR. DUBIN: Exhibit 7 will be the Gunter</p> <p>7 supplemental report that I displayed a page from.</p> <p>8 (Exhibit No. 7 was marked for identification.)</p> <p>9 MR. DUBIN: Exhibit 8 will be Dr. Su's article</p> <p>11:49:59AM 10 determining asbestos refraction indices by dispersion</p> <p>11 staining.</p> <p>12 (Exhibit No. 8 was marked for identification.)</p> <p>13 Q. (BY MR. DUBIN:) And so I want to go to the report</p> <p>14 in this case, which I guess I've just said is Exhibit 5, and</p> <p>11:50:17AM 15 ask you a little bit about that.</p> <p>16 MR. DUBIN: If we could call that up, Mike?</p> <p>17 First, if we could page through to the bench</p> <p>18 sheet.</p> <p>19 Q. (BY MR. DUBIN:) So ultimately when you're under</p> <p>11:50:50AM 20 here, optical data for asbestos identification, there's an</p> <p>21 alpha and a gamma value 650 and 510.</p> <p>22 What does that represent?</p> <p>23 A. That represents the range of the -- on the alpha</p> <p>24 on the -- on the high side to the -- I mean, you know, it</p> <p>11:51:17AM 25 gives the outside range between the two of the -- I think it</p>	<p>11:54:45AM 1 Q. What would you expect --</p> <p>2 A. A bright blue. Around 7, 750 or so.</p> <p>3 Q. Okay. And what would you expect for the parallel</p> <p>4 for talc?</p> <p>11:55:12AM 5 A. Well, if you go to the very last pages of the</p> <p>6 report, this fibrous talc has a sample. And we're seeing</p> <p>7 parallel ranges from greater than 1.595 to greater than</p> <p>8 1.600. I think those are the highest.</p> <p>9 And on the flip side, we have less than 1.550 for</p> <p>11:55:45AM 10 the alpha. So it was less than 1.550.</p> <p>11 Q. Okay. Can we then go a little bit further to the</p> <p>12 image after it?</p> <p>13 And now one of the things we were discussing and I</p> <p>14 want to make sure that I understand, were Becke lines. Can</p> <p>11:56:13AM 15 you explain to me what a Becke line is?</p> <p>16 A. The Becke line is the interface, essentially,</p> <p>17 between the fluid and the bundle.</p> <p>18 Q. Mm-hmm.</p> <p>19 A. And it's not so much a Becke line in that it is</p> <p>11:56:24AM 20 the -- I just call it that because the Becke line, if you</p> <p>21 change the focus either moves out away from the particle or</p> <p>22 moves in or is right on it. So I've been calling it a Becke</p> <p>23 line, but it's really the very first dispersion through the</p> <p>24 crystal on the outside that doesn't have to go through all</p> <p>11:56:49AM 25 the rest of the crystal to see the color.</p>
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<p>11:51:20AM 1 was either four or five representative structures -- yeah,</p> <p>2 four representative structures. So we give it a range of</p> <p>3 the alpha and gamma. And if you look down -- so for alpha,</p> <p>4 that's -- that's the highest wavelength.</p> <p>11:51:46AM 5 And for the gamma, that would be the lowest</p> <p>6 wavelength -- or the shortest wavelength, not the lowest.</p> <p>7 Q. So, for example, 510 in parallel would be a shade</p> <p>8 of magenta?</p> <p>9 A. 510?</p> <p>11:52:24AM 10 Q. Yeah.</p> <p>11 A. 1.568. I think we've already gone over that. But</p> <p>12 that is, which one? 1.568, 1.568, 1.568, 1.568.</p> <p>13 Yeah, 1.568. You know, I can see a kind of</p> <p>14 reddish color around the outside, but we spent some time</p> <p>11:52:59AM 15 talking about that.</p> <p>16 Q. Right. I'm just trying -- confirming the color.</p> <p>17 And 650 in a perpendicular would be a blue?</p> <p>18 A. Let's see where one is. 650, I just need to find</p> <p>19 it.</p> <p>11:54:14AM 20 Yes, it's blue.</p> <p>21 Q. Is 650 in perpendicular also consistent with talc</p> <p>22 fiber?</p> <p>23 A. 650 in perpendicular?</p> <p>24 No. It would be a -- it would be -- the</p> <p>11:54:41AM 25 wavelength would be higher than that.</p>	<p>11:56:52AM 1 Q. Because when we were discussing these images and</p> <p>2 you were talking about Becke lines, you can't observe Becke</p> <p>3 lines on these types of images. Correct?</p> <p>4 A. I mean, that's correct.</p> <p>11:57:05AM 5 I was just using it as an example of where you</p> <p>6 look, but no these are not technically Becke lines. That</p> <p>7 was poor choice of words on my part.</p> <p>8 Q. Okay. So some of the images that you have in this</p> <p>9 report are the type of images -- whether it's in the correct</p> <p>11:57:29AM 10 orientation or not -- are the type images in which you could</p> <p>11 try to observe a Becke line. Right?</p> <p>12 A. No. It's not a Becke line because a Becke line is</p> <p>13 not in the structure as this is. This is the first outer</p> <p>14 edge of the bundle that is causing a dispersion of light.</p> <p>11:57:49AM 15 Q. So I'm not talking about this image. I'm saying</p> <p>16 there are other images.</p> <p>17 Let's scroll down through the report a little bit.</p> <p>18 Maybe there's a better example.</p> <p>19 So I don't know whether you this is even in the</p> <p>11:58:22AM 20 correct view to observe a Becke line or not. But how do</p> <p>21 these kind of images relate to Becke lines?</p> <p>22 A. Well, the only really way to tell is from the</p> <p>23 focal plane where it's in focus. You're either -- out of</p> <p>24 focus or in one direction or out of focus in another</p> <p>11:58:47AM 25 direction and if it's a true Becke line, it will move. It</p>

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<p>11:58:52AM 1 will move into the structure, or it will move out of the 2 structure. 3 Or it will stay at a particular -- and you will 4 know if you got the right refractive indice fluid for a 11:59:03AM 5 matching. So you have to -- it's a way to look at unknowns. 6 You know, you put 1.550, zero in and it moves 7 away, I believe that is -- means -- and I always forget -- 8 it's either too high or too low to -- and what you're 9 looking for is a fluid that you don't get movement. 11:59:29AM 10 Q. Okay. And just for -- 11 A. So it matches what the wavelength -- what the 12 matching wavelength. 13 Q. Just for reference, we're looking at 14 M71614-001CSM-002. 11:59:46AM 15 So are there any images in here where we can 16 determine the colors that we're seeing in the Becke line and 17 translate those into wavelengths of light? Or do we not 18 have images to be able to do that? 19 A. You know, maybe. You don't really have the image 12:00:06PM 20 there. But the one that's parallel -- I don't know if you 21 could really do that or not. We don't do Becke line work 22 here, so it's not something I do all the time or would do. 23 I wouldn't use Becke lines to identify a 24 particulate that's unknown. I would start off with SEM or 12:00:30PM 25 something.</p>	<p>12:02:03PM 1 indices we were finding during that time period are just 2 about dead-on to the same ones we're finding now with 1.550 3 with the new microscopes and also the 1.560. 4 So it wasn't adding it to the point that caused 12:02:23PM 5 any misidentification. In also the fibrous talc because 6 clearly the birefringence refractive indices were spread 7 much further apart. So it didn't affect any of the 8 analysis. 9 But it that yellowish color that I've been told 12:02:43PM 10 comes from the tungsten filament, and which you don't have 11 with the LEDs. 12 Q. Well, again, a lot of other things go into the 13 refractive index -- a lot of other things go into that 14 birefringence calculation and the refractive index, in other 12:02:59PM 15 words, what color you're calling and the like. Right? 16 Forget it. I think we both know. Let's move on. 17 So let me back up for a second. 18 What, if anything, do you know about the bottle -- 19 the source of the bottle that you tested in -- for the 12:03:23PM 20 Valadez case? 21 It's not a bottle that he's actually used. 22 Is that fair to say? 23 A. No. It's not at all. I'm just getting to the 24 chain of custody so I can tell you exactly. 12:03:40PM 25 There's a correspondence that came along with the</p>
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<p>12:00:31PM 1 Q. Okay. So you wouldn't be able to tell me, for 2 example, if this were a Becke line, what wavelength of light 3 that -- what color -- what wavelength of light that's 4 associated with? 12:00:45PM 5 A. No. In order for me to do that, I would have to 6 be sitting at the microscope, in focus, out of focus, and 7 look at that. 8 So, no, that's not something I can just do from 9 looking at this picture. At least I can't. 12:00:59PM 10 Q. So then for purposes of understanding your 11 testimony when you were talking about Becke lines before, 12 you just mean the edge of the image and the dispersion 13 standing? 14 A. Correct. I should have been more careful about 12:01:17PM 15 how I was phrasing. 16 Q. Okay. And in -- when we were talking earlier 17 about the tungsten lighting that was on the old microscope, 18 is it fair to say that in all of the old depositions where 19 we've talked about your chrysotile findings in Johnson &amp; 12:01:38PM 20 Johnson, when you were speaking about the images depicting 21 gold colors or orange colors, that was with a microscope 22 that was using tungsten lighting that was adding yellow to 23 the image? 24 A. Yeah, could be. 12:01:59PM 25 But the interesting thing is the refractive</p>	<p>12:03:42PM 1 bottle. 2 Q. Okay. 3 A. It's in Section II -- in Section II, that -- from 4 Joseph Satterley. And he said he purchased this Johnson 12:03:58PM 5 baby powder bottle on September 20th, 2022 near 6 Mr. Valadez's home in Merced. Am I saying that correctly? 7 California. 8 And then I have a receipt from the Marriott 9 Courtyard from their market sundries department, I guess. 12:04:23PM 10 And it was \$3.19. 11 So that's what I know about it. It was an off-- I 12 guess because of the packaging, it must have been a -- must 13 have been a typical Marriott or one of these -- where you 14 pull it off. 12:04:50PM 15 And I also know that the sample was sealed; 16 meaning, when you take the top off there was a Johnson &amp; 17 Johnson seal over where the holes are. 18 MR. DUBIN: Mike, can we pull up the two images, 19 the photographs of the bottles that the plaintiff's mother 12:05:16PM 20 provided? We'll mark those as the next two exhibits in 21 order. 22 So this will be Exhibit 9, and the other one will 23 be Exhibit 10. Can we just pull the other one also, so we 24 can look at them in quick succession. Let's mark the other 12:05:50PM 25 one, Mike?</p>



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<p>12:06:03PM 1 Mike, are you there? I see your mouse. 2 (Exhibit No. 9 was marked for identification.) 3 (Exhibit No. 10 was marked for identification.) 4 Q. (BY MR. DUBIN:) While he's pulling that other one 12:06:15PM 5 up, I guess we can talk about this one. 6 Do you see a bottle of Johnson's Baby Powder in 7 the back there? 8 <b>A. I do.</b> 9 Q. You've looked at a lot of Johnson &amp; Johnson 12:06:40PM 10 bottles by now. Correct? 11 <b>A. I guess I have.</b> 12 Q. From looking at this, do you have any idea what 13 period of time this bottle is from? If it's helpful, I have 14 your declaration with the bottle images if you want me to 12:07:15PM 15 call that up. 16 <b>A. It is pretty close to the -- there's a 1978 one, I</b> 17 <b>think. I'm looking for the one that -- there we go --</b> 18 <b>pretty close to a 1978. It doesn't have the pink stripe</b> 19 <b>across the top. And if I'm looking at the photographs from</b> 12:07:47PM 20 <b>a 1978 -- and let me just keep going forward. Let's see if</b> 21 <b>we have some others.</b> 22 <b>Also, matches ones from the -- these are all NDL</b> 23 <b>ones. Pretty good matches with, you know, 1984.</b> 24 <b>And just to keep looking -- I'm still looking. I</b> 12:09:27PM 25 <b>don't have pictures of anything past the 4 and the 5. It</b></p>	<p>12:13:22PM 1 Q. I'll just mark as the next exhibit, the 2 declaration that you have prepared that has a number of 3 images of bottles just so it's attached here. 4 (Exhibit No. 11 was marked for identification.) 8:49:12AM 5 Q. (BY MR. DUBIN:) But we don't have to talk about it 6 further right now. 7 Okay. The Calidria reference -- the other 8 Calidria reference materials that you provided, I assume you 9 have electronic copies of those images. I think we got 12:13:58PM 10 scanned copies. But do you have electronic copies? 11 <b>A. Yes.</b> 12 Q. Okay. So we'll request those and follow up about 13 it. I see -- try to -- I assume that you still have not 14 identified any chrysotile in any Johnson &amp; Johnson products 12:14:26PM 15 by transmission electron microscopy; is that correct? 16 <b>A. (No audible response.)</b> 17 Q. And you did transmission electron microscopy also 18 with respect to the Valadez bottle that you received. 19 Right? 12:14:46PM 20 <b>A. Yes.</b> 21 Q. And did you do both with and without heavy density 22 liquid separation or just with? 23 <b>A. Just with for amphiboles, 2.85.</b> 24 Q. Okay. And, you know, one of the things I think 12:15:07PM 25 you've already mentioned is that number of defense experts,</p>
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<p>12:09:33PM 1 <b>looks like in that genre what I see here because of the</b> 2 <b>straight shoulders and no pink across the top.</b> 3 Q. It look like what genre? I'm sorry. 4 <b>A. Mid '80s, into the '90s. And I don't have a 2000.</b> 12:09:51PM 5 <b>I don't have about '95 on, but it matches everything going</b> 6 <b>up to about -- at least the pictures I have -- 1995.</b> 7 Q. And then -- 8 <b>A. Let me see something else here. Hold on. I would</b> 9 <b>say some time in the 90s, early 2000s. I don't have</b> 12:11:44PM 10 <b>exemplars from that, the '98, '97, '99.</b> 11 Q. How about let's look at the next exhibit, 12 Exhibit 10. It's harder to see this, I guess. 13 <b>A. That's in the -- because of that rounded</b> 14 <b>shoulder -- again, it's hard for me to see. I'm just</b> 12:12:08PM 15 <b>looking at the top, the way it rounds off.</b> 16 <b>I would say that is sometime in the 2014s, 2015s.</b> 17 <b>At least according -- you know, I'm looking at some of</b> 18 <b>the client samples on how that rounded shoulder is, at the</b> 19 <b>top.</b> 12:12:26PM 20 <b>And does look like -- I just wish I could see that</b> 21 <b>top better. Let me see if I've got a picture I could see</b> 22 <b>that's not blown up like that.</b> 23 Q. Okay. 24 <b>A. Now just because of the rounded shoulders, I would</b> 12:13:19PM 25 <b>say that's a newer bottle than the last one.</b></p>	<p>12:15:11PM 1 such as Dr. Gunter or Dr. Sanchez, have questioned your 2 identification of chrysotile. 3 Why haven't you tried to identify chrysotile by 4 TEM in response to that to prove that your identification is 12:15:31PM 5 correct? 6 <b>A. It is correct. I mean, the first thing is,</b> 7 <b>there's no requirement to do TEM.</b> 8 <b>We have validated a few samples by SEM we're still</b> 9 <b>working on to maximize the -- the harvest of the chrysotile.</b> 12:15:54PM 10 <b>And it's come to my conclusion that the defense</b> 11 <b>experts are in fact misidentifying chrysotile for fibrous</b> 12 <b>talc, especially Mickey Gunter.</b> 13 Q. Could you take one of the particles that you've 14 identified as chrysotile from the PLM slide, crush it up, 12:16:23PM 15 put it on a TEM grid, and verify what mineral it is? 16 MR. RIVAMONTE: Improper hypothetical. 17 THE WITNESS: Because we're dealing with such 18 small structures the answer is no. We'll get there, 19 Mr. Dubin, we're just taking it -- you understand we're not 12:16:40PM 20 in a research lab. 21 Q. I -- 22 <b>A. We don't -- hold on. I don't get grants that we</b> 23 <b>can do this full-time. You know, it took the Colorado</b> 24 <b>School of Mines -- a big university, it was full-time --</b> 12:16:53PM 25 <b>took them a year to work out their heavy -- their double</b></p>

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<p style="text-align: right;">Page 86</p> <p>12:16:58PM 1 density heavy liquid separation. So we have validated by 2 SEM, the PLM. 3 And Sanchez and Gunter are just wrong, especially 4 Gunter since he misidentified Calidria 210 in 1.550 that was 12:17:19PM 5 suspended in a matrix of bentonite clay. He called it 6 fibrous talc. 7 And he also said that if he showed me a thousand 8 of these, it would be the same answer. 9 Q. Again, so I want to make sure I understand your 12:17:36PM 10 statement. So if you identify the particle on PLM, you can 11 take this particle off with tweezers. Right? 12 A. You cannot remove a particle that small. 13 I know R.J. Lee has this technique of doing it to 14 put it on an SEM stub. 12:18:00PM 15 So if you're dealing at a microscopic level, to 16 pull it out -- the coverslip off -- extract it with a very 17 thin tungsten needle and then put it on -- they put it on an 18 SEM stub and they dropped some alcohol of it or acetone to 19 remove the fluid. 12:18:23PM 20 But what they do that with, is -- are a much 21 larger particles than what we're dealing with here. 22 Q. Okay. Well, what size particle do you think it 23 would need to be in order for you to do that? 24 A. Oh, about the size range I've seen for amphiboles, 12:18:41PM 25 50 microns, 100 microns.</p>	<p style="text-align: right;">Page 88</p> <p>12:20:45PM 1 reserve the right if I have to go back and change the -- do 2 the calculations over if the testimony was not the same as 3 my assumptions. 4 Q. Do you have any calculations, as we're sitting 12:20:58PM 5 here today? 6 A. No, I only talked to Ian this morning with about 7 30 minutes to go before the deposition. So it won't take 8 long. 9 Q. Okay. Switching gears a little bit. You are 12:21:19PM 10 aware that Johnson &amp; Johnson, part of its testing program 11 since the 1970s has included TEM work. Correct? 12 A. I have -- I am aware of that. 13 Q. And I know now you've been involved in cases that 14 have included a number of other manufacturers of 12:21:47PM 15 talc-containing products. Correct? 16 A. Correct. 17 Q. As you sit here today, are you aware of any other 18 company besides Johnson &amp; Johnson -- that had TEM testing as 19 part of its regular testing program? 12:22:12PM 20 A. Pfizer did a lot of their own testing. Cyprus did 21 a lot of their own testing until they were no longer 22 involved. 23 To the extent that Johnson &amp; Johnson tested all 24 the way and still testing, I'm not aware of any other 12:22:35PM 25 companies did it to that degree.</p>
<p style="text-align: right;">Page 87</p> <p>12:18:46PM 1 Q. Okay. 2 A. These are averaging about 10 microns in length and 3 about 2 microns wide. 4 Q. Can you -- you also have an exposure report here 12:19:04PM 5 for Mr. Valadez? 6 A. Oh, yeah. 7 Q. So I believe there's a total weight of talc you 8 have determined that was applied to them. 9 A. Well, yes. But there's also a caveat in there 12:19:29PM 10 that when you get the report in the timeframe that it was 11 supposed to be, you know, given to you guys, the mother had 12 not been deposited yet. 13 And so when I did the calculations, I made some 14 assumptions, such as, you know, typically potty-training is 12:19:54PM 15 two and a half years. The boys are three. So I used two 16 and a half years as the timeframe that Evan was in 17 diapers -- not Evan, excuse me -- Anthony, jeez. 18 When I talked to Ian this morning because she was 19 just deposited yesterday, and she testified that it was 1.5 12:20:18PM 20 years. 21 And so that's one year too long. 22 And I also made the assumption that when Anthony 23 was bathed, he was bathed once day. I understand she 24 testified to two times a day. So -- 12:20:33PM 25 And I put all that in the report, that I -- that I</p>	<p style="text-align: right;">Page 89</p> <p>12:22:41PM 1 But it was to actually find out if asbestos is 2 present, all that TEM testing that was done in all the 3 non-detects was clearly a waste of money. 4 Q. And Amorous was a talc -- a seller of raw talc? 12:23:04PM 5 A. It was. 6 Q. Okay. And Pfizer, was that in connection with 7 Pfizer products or a sale of talc? 8 A. Both Cyprus and Pfizer were selling talc, as well 9 as using it in sales in some products. 12:23:21PM 10 Q. How about product manufacturers? Is there any 11 product manufacturers other Johnson &amp; Johnson that you know 12 who had TEM as part of their routine testing? 13 A. I don't know any other manufacturer that did the 14 amount of TEM work that Johnson &amp; Johnson did. That, to me, 12:23:42PM 15 was a methodology designed specifically not to find 16 asbestos. Since Johnson &amp; Johnson absolutely knew that they 17 had a method developed that was too sensitive for their 18 detection limits and went with the typical dilution 19 method -- 12:24:03PM 20 So one the hand, no, I don't know any other 21 companies maybe did many analysis. I know either, it's 22 Cyprus or Pfizer -- maybe Cyprus analyzed over 2,000 samples 23 by TEM from Montana and Italy. 24 I think the got those right. 12:24:23PM 25 So maybe -- and they were finding asbestos. They</p>



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<p>12:24:26PM 1 <b>have done more -- I don't know how many that Johnson &amp;</b> 2 <b>Johnson has done, but I don't think it's north of 2,000 or</b> 3 <b>even close to 2,000.</b> 4 MR. DUBIN: Okay. Let me take -- let's take a 12:24:39PM 5 10-minute break. I'm going to review my notes and see if 6 I've got anything I need to do. 7 THE WITNESS: Okay, great. Thank you. 8 VIDEOGRAPHER: The time is 11:24 a.m., Pacific 9 Time, and we're off the record. 12:24:52PM 10 This marks the end of Media III. 11 (Off the record at 2:24 p.m., and record resumes 12 at 2:38 p.m., EST) 13 VIDEOGRAPHER: The time is 1:18 a.m., Pacific 14 Time, and we're back on the record. 12:38:55PM 15 This marks the beginning of Media IV. 16 THE WITNESS: Mr. Dubin? 17 MR. DUBIN: Yep. 18 THE WITNESS: I went through and did the -- 19 recalculated based on the mother's deposition and it's only 12:39:10PM 20 11 pounds more than the 2019. So 240 pounds. 21 Q. (BY MR. DUBIN:) Was MAS NAV ever accredited for 22 asbestos testing in 2001? 23 <b>A. In 2001?</b> 24 Q. Yeah. 12:39:26PM 25 <b>A. I believe so.</b></p>	<p>12:40:54PM 1 deposits in California. Correct? 2 <b>A. Correct.</b> 3 Q. And it's a unique geologic -- that mine is unique 4 geological feature, in other words what's called short fiber 12:41:10PM 5 chrysotile asbestos. Right? 6 <b>A. Yes.</b> 7 Q. And there are certain -- without getting into it, 8 there are certain geological features that are believed to 9 have resulted in that asbestos type, including obviously 12:41:27PM 10 there's a lot of tectonic activity in that region. 11 Is that right? 12 <b>A. I don't know what the geological features are that</b> 13 <b>caused the formation of the Calidria or the Coalinga</b> 14 <b>chrysotile versus, say, Canada.</b> 12:41:47PM 15 Q. That's fine. 16 <b>A. It definitely has a different characteristic, if</b> 17 <b>you're not looking at it in a product. It literally looks</b> 18 <b>like talcum powder.</b> 19 Q. Right. I mean, in fact I think that the people 12:42:00PM 20 who discovered that deposit originally thought it was a talc 21 deposit. Right? 22 <b>A. That, I don't know.</b> 23 Q. My question is: When you say that the chrysotile 24 in cosmetic talcum powder is similar to the Calidria 12:42:22PM 25 chrysotile, is that at all related to geological conditions,</p>
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<p>12:39:30PM 1 Q. Do you -- are you aware of whether that 2 accreditation involved participating in bulk proficiency 3 testing? 4 <b>A. Ever since we became a member, we were, yes.</b> 12:39:42PM 5 Q. Does MAS have records related to those 6 accreditations? 7 <b>A. All the way back then? I don't know how far it</b> 8 <b>goes.</b> 9 <b>I thought when you guys did your foyer and got all</b> 12:39:55PM 10 <b>the records that you got everything you needed.</b> 11 Q. Okay. Do you recall if any of this bulk 12 proficiency tested involved Calidria? 13 <b>A. I've seen that, and I've never checked to see if</b> 14 <b>we were part of that or not.</b> 12:40:13PM 15 Q. All right. We'll request any materials that you 16 have about that. We'll follow up with a request for it. 17 And on that subject, we've been talking a lot 18 about SG210 or RG144 and that those are different grades of 19 what's called -- sometimes called Calidria asbestos. 12:40:35PM 20 Correct? 21 <b>A. Correct.</b> 22 Q. And that was a trade name for asbestos sold by a 23 company called Union Carbide. Right? 24 <b>A. Correct.</b> 12:40:46PM 25 Q. And it was mined from the New Idria Serpentine</p>	<p>12:42:26PM 1 or are you saying only that it's the milling process that 2 makes that occur? 3 <b>A. When I say, it's relative, it's related to -- I'm</b> 4 <b>talking about the refractive indices.</b> 12:42:40PM 5 Q. Right. 6 <b>A. The refractive indices are very close in 1.550 to</b> 7 <b>what we're finding in the amount of 1.560, the same thing.</b> 8 <b>And the Calidria, morphologically, is very different than</b> 9 <b>Canadian chrysotile, but the chemistry is not that</b> 12:43:03PM 10 <b>different. So I'm trying to determine what gives it a</b> 11 <b>completely different set of refractive indices much higher</b> 12 <b>in the gamma direction in 1.550 than Canadian or Black Lake</b> 13 <b>chrysotile. And the only difference is the size.</b> 14 Q. Right. Well, for example, do you have any reason 12:43:26PM 15 to believe that the unique geological features that produced 16 Calidria asbestos in California exist also in all the talc 17 mines in which you're finding chrysotile? 18 <b>A. I doubt that if you're going to have tectonic</b> 19 <b>movement.</b> 12:43:50PM 20 <b>The one thing that makes it all the same is</b> 21 <b>that -- is the size. It's been milled. You know, you don't</b> 22 <b>find really long -- you don't find this long bundles. And</b> 23 <b>we -- you know, we're seeing things on the order of</b> 24 <b>10-microns in length on average.</b> 12:44:19PM 25 <b>And then same is -- now the 144 is of a much</b></p>

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<p style="text-align: right;">Page 94</p> <p>12:44:24PM 1 <b>bigger size. You have to look around for the smaller stuff.</b></p> <p>2 <b>But the 210, they're all showing up about the same</b></p> <p>3 <b>length that you're seeing in cosmetic talcs.</b></p> <p>4 Q. So, again, just trying to figure out. You're not</p> <p>12:44:40PM 5 saying that the unique geological features that produce</p> <p>6 Calidria exist in these talc mines, you're just saying that</p> <p>7 the milling process turns into a similar size; is that</p> <p>8 correct? Or is there something else to it?</p> <p>9 <b>A. No. My hypothesis is that the only real</b></p> <p>12:44:59PM 10 <b>difference that something that would be the same across the</b></p> <p>11 <b>board, is the size of the 210 that's obviously been milled</b></p> <p>12 <b>compared the 144.</b></p> <p>13 <b>You know, the 144, I think the average length</b></p> <p>14 <b>for -- hold on -- I'll tell you what the average length is</b></p> <p>12:45:21PM 15 <b>for the 144 if we're looking for the small stuff.</b></p> <p>16 <b>That's not it.</b></p> <p>17 <b>The average bundle size for the RG144 is for --</b></p> <p>18 <b>you know, again, not a big population -- 1, 2, 3, 4, 5, 6,</b></p> <p>19 <b>7, 8 with 74 microns.</b></p> <p>12:45:58PM 20 <b>The SG210, average length was -- you know, 15</b></p> <p>21 <b>measurements was 10.5.</b></p> <p>22 <b>The average length of the chrysotile in the</b></p> <p>23 <b>Gold Bond is 10.5. So what is causing the difference? It</b></p> <p>24 <b>can't be geological. If you look at the EDS spectras, it</b></p> <p>12:46:28PM 25 <b>has about the same chemistry. There's nothing weird in</b></p>	<p style="text-align: right;">Page 96</p> <p>12:48:35PM 1 Q. Do you intend to do any work analyzing talc or</p> <p>2 Calidria at 1565 or 1570?</p> <p>3 <b>A. No. You know, we'll think about 1565 where we're</b></p> <p>4 <b>actually using refractive indice [sic] fluid versus a</b></p> <p>12:48:59PM 5 <b>heating stage.</b></p> <p>6 MR. DUBIN: Those are my questions for today.</p> <p>7 I'll pass so that we can get you done.</p> <p>8 Thanks, Dr. Longo.</p> <p>9 THE WITNESS: Oh, thank you, Mr. Dubin.</p> <p>12:49:10PM 10 Always a pleasure to see you.</p> <p>11 MR. CHARCHALIS: And, Dr. Longo, are you fine if I</p> <p>12 just get into it, or do you need a quick two minutes?</p> <p>13 THE WITNESS: No, go ahead.</p> <p>14 MR. CHARCHALIS: All right. Thank you.</p> <p>12:49:21PM 15</p> <p>16 EXAMINATION</p> <p>17 BY MR. CHARCHALIS:</p> <p>18 Q. So, as you know, I represent the retailers in this</p> <p>19 litigation so you know what my questions will be focused on.</p> <p>12:49:28PM 20 <b>A. You know what my answers are going to be. I can</b></p> <p>21 <b>adopt all the other answers about that and skip it.</b></p> <p>22 Q. In your calculations specific for this case, none</p> <p>23 of your exposure calculations -- well, withdrawn.</p> <p>24 In your calculations for this case, none of them</p> <p>12:49:46PM 25 were specific to the retailers. Correct?</p>
<p style="text-align: right;">Page 95</p> <p>12:46:32PM 1 <b>there. And of course the diffraction patterns are the same.</b></p> <p>2 <b>But the only one factor is, it's been milled.</b></p> <p>3 Q. And when -- when did you do the SG210 in 1560?</p> <p>4 When did you do that? When was that?</p> <p>12:46:59PM 5 <b>A. That was back in -- according to the -- it looks</b></p> <p>6 <b>like it was some time in this January.</b></p> <p>7 Q. Okay. And --</p> <p>8 <b>A. Started the 1560 before that, but then we now have</b></p> <p>9 <b>to go back through looking at all the standards so that we</b></p> <p>12:47:16PM 10 <b>have a robust -- but we do have analysis of the SG210 in two</b></p> <p>11 <b>different matrices, bentonite and calcium carbonate, which</b></p> <p>12 <b>eliminates the talc.</b></p> <p>13 Q. And those are in 1550?</p> <p>14 <b>A. Those are all in 1550.</b></p> <p>12:47:40PM 15 <b>I want to go back now and do it in 1560.</b></p> <p>16 Q. Okay. And in terms of SG210 or Calidria, how</p> <p>17 different is that, if at all, from Canadian shorts, like</p> <p>18 grade 7?</p> <p>19 <b>A. Canadian shorts, grade 7 is still a lot of big</b></p> <p>12:48:04PM 20 <b>stuff. And you're going to get -- you get the same thing.</b></p> <p>21 <b>It's big stuff.</b></p> <p>22 <b>The chrysotile needs -- and it's almost impossible</b></p> <p>23 <b>to sieve. So, you know, future work. Maybe -- maybe take</b></p> <p>24 <b>7m and liquid nitrogen freeze it and mill it. Have it pass</b></p> <p>12:48:30PM 25 <b>through a 200-mesh grid, and then see what it does.</b></p>	<p style="text-align: right;">Page 97</p> <p>12:49:48PM 1 <b>A. Correct.</b></p> <p>2 Q. And after you obtained some additional information</p> <p>3 from Mr. Rivamonte this morning regarding the mother's</p> <p>4 deposition, you don't intend to perform any calculations</p> <p>12:50:02PM 5 specific to the retailers. Correct?</p> <p>6 <b>A. That is correct. I am not.</b></p> <p>7 Q. And I'm just going to -- as a brief</p> <p>8 hypothetical -- represent to you that in her dep testimony</p> <p>9 yesterday, Mr. Valadez's mother stated that she was unable</p> <p>12:50:21PM 10 to estimate how many containers of Johnson's Baby Powder she</p> <p>11 purchased from any individual retailer on average in a year.</p> <p>12 She was unable to estimate which retailer she purchased the</p> <p>13 most of the product from.</p> <p>14 And so based upon those, assuming that is</p> <p>12:50:44PM 15 correct -- that I'm representing her testimony correctly to</p> <p>16 you -- you will not be performing any calculation specific</p> <p>17 to the retailers. Correct?</p> <p>18 <b>A. I will not try to assign any amount of containers</b></p> <p>19 <b>to any particular retailer.</b></p> <p>12:50:59PM 20 Q. Okay.</p> <p>21 MR. RIVAMONTE: Just a belated objection.</p> <p>22 Objection to the extent it misstates testimony. And</p> <p>23 improper hypothetical.</p> <p>24 MR. CHARCHALIS: That's fine. And any other</p> <p>12:51:11PM 25 objections, I'll stipulate if it's brought up throughout the</p>

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<p>12:51:11PM 1 case, that if it's belated, it's timely.</p> <p>2 Q. (BY MR. CHARCHALIS:) Okay. So I have here -- let</p> <p>3 me share my screen. I'll do this as quick as possible --</p> <p>4 from one of your --</p> <p>12:51:32PM 5 Do you see a document that says: Mass chart of</p> <p>6 J &amp; J, at the top? September 16th, 2021.</p> <p>7 A. Yes.</p> <p>8 Q. Is that -- I went through the documents you</p> <p>9 produced. To me, this appeared to be the most recent one.</p> <p>12:51:50PM 10 Is this the most recent chart?</p> <p>11 A. It is. It was updated September 16th, 2021.</p> <p>12 And this container that I analyzed, is probably</p> <p>13 the first Johnson &amp; Johnson container that we've analyzed in</p> <p>14 a couple years. I mean, ever since bankruptcy.</p> <p>12:52:09PM 15 Q. And so that's leading to my next question. The</p> <p>16 only container that would not be in this chart is the one</p> <p>17 you recently tested, that you have opened thus far in this</p> <p>18 case. Correct?</p> <p>19 A. Correct.</p> <p>12:52:23PM 20 MR. CHARCHALIS: Could we go off the record for</p> <p>21 one second?</p> <p>22 VIDEOGRAPHER: Okay. The time is 11:52 a.m.</p> <p>23 Pacific Time, and we're off the record.</p> <p>24 This marks the end of Media IV.</p> <p>12:53:22PM 25 (Off the record at 2:52 p.m., and record resumes</p>	<p>12:54:57PM 1 correct.</p> <p>2 Was this one of the sections that she input the --</p> <p>3 the attorney input the information into the chart for you?</p> <p>4 A. Yes. I asked her to do that so I wouldn't have to</p> <p>12:55:09PM 5 go back and look through all the depositions.</p> <p>6 Q. And so you didn't review the deposition to</p> <p>7 determine whether it was CVS, Rite Aid or Albertsons?</p> <p>8 A. No. She didn't know where they came from.</p> <p>9 Q. Okay.</p> <p>12:55:22PM 10 A. No, I did read the depositions because I was in</p> <p>11 all those cases.</p> <p>12 But things like MAS, you know: Retailer, Publix,</p> <p>13 that's where I bought it. So anything that says "MAS," is I</p> <p>14 filled it.</p> <p>12:55:40PM 15 Q. Okay. And so for this one, the plaintiff who</p> <p>16 provided the container did not know if it was from --</p> <p>17 actually from Albertsons, they just said it could have been</p> <p>18 from CVS, Rite Aid or Albertsons. Correct?</p> <p>19 A. Right. It's this is where she purchased her</p> <p>12:55:57PM 20 containers.</p> <p>21 And I just put them in there. But I don't have</p> <p>22 any opinions about any of the retailers. You know,</p> <p>23 knowledge of who knew what, when; should they have worn it,</p> <p>24 that's not my area. It doesn't matter what retailer it</p> <p>12:56:09PM 25 comes from, to me, I'm just analyzing the product.</p>
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<p>12:53:22PM 1 at 2:53 p.m., EST)</p> <p>2 VIDEOGRAPHER: Time is 11:53 a.m., Pacific Time,</p> <p>3 and we are back on the record.</p> <p>4 This marks the beginning of Media V.</p> <p>12:53:44PM 5 MR. CHARCHALIS: All right. Thank you for that.</p> <p>6 Q. (BY MR. CHARCHALIS:) So turning to what is --</p> <p>7 going down, you see 18 here?</p> <p>8 Sorry, not that one.</p> <p>9 A. 18. I have my own, so I can follow along.</p> <p>12:54:01PM 10 Q. You have your own? All right. So I'm on -- I'm</p> <p>11 in the table titled, Table II, Containers from outside J &amp; J</p> <p>12 archive post and at Container 18.</p> <p>13 Are you there?</p> <p>14 A. I am.</p> <p>12:54:22PM 15 Q. Okay. So for source there, it says: Retailer</p> <p>16 CVS, Rite Aid and Albertsons and from the client, Linda</p> <p>17 Zimmerman.</p> <p>18 That information that is from CVS, Rite Aid or</p> <p>19 Albertsons, that was from another attorney. Correct?</p> <p>12:54:44PM 20 A. Well, yes. It was from her deposition.</p> <p>21 Q. Okay. And so --</p> <p>22 A. This is where I bought them at.</p> <p>23 Q. And this is -- and I believe and we've talked</p> <p>24 about it before, so I'm not going to try -- I'm going to try</p> <p>12:54:54PM 25 and not belabor it, but I just want to make sure I'm</p>	<p>12:56:11PM 1 Q. And I appreciate that. That will help expedite</p> <p>2 things. But I have to ask a few more followups on these.</p> <p>3 So just to be clear, there's no container that you</p> <p>4 purchased from Albertsons. Correct?</p> <p>12:56:28PM 5 A. Correct. We don't have an Albertsons here.</p> <p>6 Q. And are there any containers where you identify</p> <p>7 the source as only Albertsons, that you tested?</p> <p>8 A. Not that I'm aware of.</p> <p>9 Q. Okay. I'll represent that this is --</p> <p>12:56:44PM 10 A. Possibly in here, but I don't think there is one</p> <p>11 from Albertsons.</p> <p>12 Q. Okay. I'll represent I reviewed the chart and</p> <p>13 this 18 in Table II was the only one that references</p> <p>14 Albertsons, I believe. It's my understanding that the</p> <p>12:57:00PM 15 plaintiff testified, the CVS, Rite Aid or Albertsons. So we</p> <p>16 can move on from Albertsons.</p> <p>17 So now next going to 26 in this table. So 26 --</p> <p>18 are you there?</p> <p>19 A. Yeah.</p> <p>12:57:22PM 20 Q. So this is Container ID M71211-001. And these</p> <p>21 were from Holly Johnson, the source. And I'm going to --</p> <p>22 A. You still at the top of II?</p> <p>23 Q. I believe I am let me just doublecheck.</p> <p>24 A. Well, I mean, here's Table I.</p> <p>12:57:40PM 25 Q. Yep. Table II.</p>

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<p>12:57:41PM 1 <b>A. Table II. I just must have been in the wrong</b></p> <p>2 <b>place, which -- surprising to me. Okay, I've got it now.</b></p> <p>3 Q. Okay. So the sources in 26 and 27 is off the</p> <p>4 shelf from client Holly Johnson, and it says: Retailer,</p> <p>12:58:01PM 5 Walmart.com. Do you see that?</p> <p>6 <b>A. Retailer No. 20?</b></p> <p>7 Q. 26 and 27?</p> <p>8 <b>A. Oh, 26. Yes, it says Walmart.</b></p> <p>9 Q. Walmart.com. Correct?</p> <p>12:58:12PM 10 <b>A. Correct.</b></p> <p>11 Q. Okay. And so I'm correct that Ms. Holly Johnson</p> <p>12 purchased this offline. She didn't actually get this from</p> <p>13 the shelf in a Walmart. Correct?</p> <p>14 <b>A. That is correct.</b></p> <p>12:58:27PM 15 Q. And isn't it correct that this was from a</p> <p>16 third-party seller that was selling products using the</p> <p>17 Walmart website?</p> <p>18 Is that correct?</p> <p>19 <b>A. That, I don't know unless that's in the chain of</b></p> <p>12:58:40PM 20 <b>custody.</b></p> <p>21 Q. Okay. So if the receipts indicate that, you would</p> <p>22 have no reason to dispute it, if any of the documents</p> <p>23 indicate that?</p> <p>24 <b>A. That's correct. I have no reason to dispute it.</b></p> <p>12:58:50PM 25 Q. Okay. But you would agree that these containers</p>	<p>1:00:22PM 1 that is, but it wasn't really matter to me.</p> <p>2 I think, well, obviously, it matters to you more.</p> <p>3 Q. (BY MR. CHARCHALIS:) Okay. And so do you recall</p> <p>4 reviewing the -- well, withdrawn.</p> <p>1:00:37PM 5 You would have no reason to dispute any of the</p> <p>6 records --</p> <p>7 MR. RIVAMONTE: I'm sorry, Mr. Charchalis, I have</p> <p>8 to respond really quick to your response to my objection.</p> <p>9 Just for the record, I want to refer</p> <p>1:00:49PM 10 Mr. Charchalis to Bolger vs. Amazon.com, where a court of</p> <p>11 appeals held that a website can be held liable under certain</p> <p>12 products liability, even though it's a third-party seller.</p> <p>13 That's why I'm stating: Objection, misstates</p> <p>14 California law.</p> <p>1:01:06PM 15 MR. CHARCHALIS: And, again, I haven't stated</p> <p>16 anything about the law. I asked if it was in their physical</p> <p>17 possession. I did not ask anything about legal chain of</p> <p>18 distribution or potential liability.</p> <p>19 But thank you.</p> <p>1:01:16PM 20 THE WITNESS: I was just going to say that. Not.</p> <p>21 Q. (BY MR. CHARCHALIS:) So you would have no reason</p> <p>22 to dispute if the records from the Holly Johnson matter, in</p> <p>23 the chain of custody, indicate that these documents were</p> <p>24 purchased from a third-party seller. Correct?</p> <p>1:01:37PM 25 <b>A. If there's documents that show that, I don't see</b></p>
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<p>12:58:53PM 1 were not purchased from within a physical Walmart store.</p> <p>2 Correct?</p> <p>3 <b>A. I would agree.</b></p> <p>4 Q. Okay. And now, going down to 32 and 33. So</p> <p>12:59:04PM 5 that's M71211-007 and -008. These are, again, Holly</p> <p>6 Johnson. It says off the shelf, but you would agree that</p> <p>7 those are not off the physical shelf in a Walmart. Correct?</p> <p>8 <b>A. Oh, I would agree. It wasn't intended to say off</b></p> <p>9 <b>the -- out of a physical shelf that somebody bought it.</b></p> <p>12:59:28PM 10 <b>It's just sort of a -- that it was purchased from</b></p> <p>11 <b>a retailer off-the-shelf-type thing.</b></p> <p>12 Q. And, again, you have -- if this was sold by a</p> <p>13 third party seller shipped directly to Ms. Johnson by that</p> <p>14 third party, it would never have been in the possession of</p> <p>12:59:51PM 15 Walmart. Correct?</p> <p>16 <b>A. I'm not sure what that means.</b></p> <p>17 MR. DUBIN: Objection -- the law.</p> <p>18 THE WITNESS: If this came off the internet, it</p> <p>19 wouldn't have been in a Walmart store.</p> <p>1:00:08PM 20 MR. RIVAMONTE: Objection. Misstates California</p> <p>21 law.</p> <p>22 (Simultaneous speaking.)</p> <p>23 THE WITNESS: -- do you want to come pick it up at</p> <p>24 the store? Or do you want to have delivered?</p> <p>1:00:20PM 25 So I don't have enough information to say which</p>	<p>1:01:40PM 1 <b>why I would have -- if there's actually documents that show</b></p> <p>2 <b>that, I don't see any reason why I would dispute that.</b></p> <p>3 Q. Okay. I'll move along. Thank you.</p> <p>4 25, it says off-the-shelf retailer Target. And it</p> <p>1:02:01PM 5 was sent by Humphrey, Farrington &amp; McClain.</p> <p>6 Do you know who purchased it off the shelf in</p> <p>7 Target?</p> <p>8 <b>A. Yes. Steve Craig from Humphrey, Farrington &amp;</b></p> <p>9 <b>McClain. They're not involved in talcum powder, and</b></p> <p>1:02:20PM 10 <b>sometime back then I was talking -- we were talking because</b></p> <p>11 <b>I work on other stuff for him. He's a plaintiff's attorney.</b></p> <p>12 <b>He said: Yeah, I think my wife just bought a big</b></p> <p>13 <b>container.</b></p> <p>14 <b>I said -- I asked him, said: Would you mind</b></p> <p>1:02:28PM 15 <b>sending it to me? Has it been opened up? So...</b></p> <p>16 Q. So this purchase had no relation to any</p> <p>17 litigation?</p> <p>18 <b>A. Nothing to do -- this law firm does not do any</b></p> <p>19 <b>cosmetic talc litigation.</b></p> <p>1:02:53PM 20 Q. Were there any other individuals that you asked,</p> <p>21 outside of the scope of litigation, to send you containers</p> <p>22 of baby powder that you became aware they purchased?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. And who?</p> <p>1:03:08PM 25 <b>A. Nothing to do with this case. There's not been</b></p>

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<p style="text-align: right;">Page 106</p> <p>1:03:16PM 1 <b>any analysis I'm relying on. This was a home purchase from</b> 2 <b>different areas around the world, and MAS is paying for the</b> 3 <b>analysis.</b> 4 Q. Well, that wasn't done on any consulting basis. 1:03:31PM 5 Correct? Litigation -- 6 <b>A. No. It's my own curiosity of the containers</b> 7 <b>bought in different countries.</b> 8 Q. Okay. And so the containers bought in different 9 countries that you're testing on your own for your own 1:03:49PM 10 curiosity, have you concluded the testing of any of those 11 containers? 12 <b>A. No, of course not. They've been sitting here for</b> 13 <b>a while.</b> 14 Q. You haven't done testing on any of those 1:04:01PM 15 containers that you've collected? 16 <b>A. Well, I can't say I have or I haven't. I haven't</b> 17 <b>issued any reports on them. It's not in the context of</b> 18 <b>litigation at all.</b> 19 <b>And until I'm done with them all and put a report</b> 1:04:19PM 20 <b>together, I can't really -- I -- I -- it's confidential to</b> 21 <b>us, so I'd prefer not to talk about it.</b> 22 Q. What is the basis for it being confidential to 23 you, if it's not in the context of any litigation? 24 <b>A. Well, it's for our own research.</b> 1:04:35PM 25 MR. RIVAMONTE: Objection. Argumentative.</p>	<p style="text-align: right;">Page 108</p> <p>1:06:03PM 1 Q. (BY MR. CHARCHALIS:) okay. And that's fine. I 2 just want to make clear -- I'm just going to ask one more 3 time, then I'm going to move on. 4 So even though it's my position that that 1:06:12PM 5 investigation is not confidential under any California law, 6 it is your position that you will not be disclosing that, 7 any information about whether you've conducted any testing 8 yet on those containers? 9 <b>A. That's correct.</b> 1:06:28PM 10 MR. RIVAMONTE: And I raise the same objections as 11 before. 12 MR. DUBIN: That's fine. 13 Q. (BY MR. CHARCHALIS:) And are any of those 14 containers sourced from Vermont, to your knowledge, that you 1:06:40PM 15 have? 16 <b>A. I prefer not to answer that also. I can neither</b> 17 <b>confirm or deny it was sourced from Vermont.</b> 18 Q. Okay -- 19 <b>A. And the one time I thought I answered a -- the</b> 1:06:53PM 20 <b>question about some confidential material, then it was ruled</b> 21 <b>that up opened the door.</b> 22 <b>So, you know, I don't have counsel here to advise</b> 23 <b>me what I should or should not say.</b> 24 Q. Okay. And that's fine. I'm just going to ask a 1:07:16PM 25 couple more questions just so the record's there, and then</p>
<p style="text-align: right;">Page 107</p> <p>1:04:39PM 1 THE WITNESS: It's not ready to be talked about or 2 start getting subpoenas about it. And I can't even confirm 3 or deny we've tested any of them yet. 4 Q. (BY MR. CHARCHALIS:) And how would confirming or 1:04:51PM 5 denying whether you've tested any of it disclose any 6 confidential results or information? 7 MR. RIVAMONTE: Objection. Argumentative. 8 Counsel, Dr. Longo is not relying on any of those 9 tests, if any were conducted, for the purposes of this case. 1:05:08PM 10 So this line of questioning is argumentative and harassing. 11 THE WITNESS: I mean, I'm not attorney so I'm just 12 saying it's not anything I am relying on in any of the 13 litigation of any cosmetic tales. I can neither confirm or 14 testimony that we've tested them. I prefer not to talk 1:05:32PM 15 about it. 16 Q. (BY MR. CHARCHALIS:) I understand you may prefer 17 not to talk about it, but if you're conducting testing on a 18 product that is the same product, which is Johnson's Baby 19 Powder that's at issue in this litigation and it's not 1:05:46PM 20 subject to any consulting privilege, which some of the other 21 testing is whether or not you are comfortable testifying 22 about it, doesn't mean that we can't ask you questions about 23 it so -- 24 THE WITNESS: I understand your position, you 1:06:00PM 25 understand my position. You will have to go to a judge.</p>	<p style="text-align: right;">Page 109</p> <p>1:07:17PM 1 I'm going to move on. 2 And so you won't, at this time, testify or provide 3 information as to whether any of those containers that you 4 have in your possession -- what retailers they're 1:07:29PM 5 potentially from. Correct? 6 MR. RIVAMONTE: Same objection as before. 7 THE WITNESS: I have no idea what retailers they 8 came from. 9 MR. CHARCHALIS: And I'll give you a running 1:07:40PM 10 objection on this line of the questions. 11 Q. (BY MR. CHARCHALIS:) And you won't confirm where 12 any of those containers that you received are sourced from. 13 Correct? 14 Because I only asked you about Vermont, but you 1:07:52PM 15 won't, in general, about where any -- 16 <b>A. I will give you one information. None of them</b> 17 <b>have been sourced from this country.</b> 18 Q. And you won't state whether any of them were 19 sourced from China, one way or the other? 1:08:15PM 20 <b>A. Do you have retailers in China that you represent?</b> 21 Q. Well, you've testified -- talc. 22 I'm saying that talc was sourced from, not the 23 product was purchased in China. The talc in the Johnson's 24 Baby Powder. 1:08:29PM 25 <b>A. I think we're talking about --</b></p>

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1:08:31PM 1 MR. RIVAMONTE: Same objections as before.  
 2 THE WITNESS: Yes.  
 3 It's a can't either confirm or deny that. We've  
 4 turn over almost a hundred analysis [sic] of Chinese talc.  
 1:08:43PM 5 Q. (BY MR. CHARCHALIS:) That's fine. I'm going to  
 6 move on now. Thank you for bearing with me on that.  
 7 **A. No problem.**  
 8 Q. So this container of talc from Target that this  
 9 friend of yours sent to you, that's the only container that  
 1:08:58PM 10 was allegedly purchased from Target, correct, that you've  
 11 tested?  
 12 **A. Yeah, I think so. If there was any other ones, it**  
 13 **would have been I purchased from Target, but I don't think I**  
 14 **did.**  
 1:09:10PM 15 Q. Sorry. I don't think I heard the end of what you  
 16 said. What was that?  
 17 **A. It must be the only one.**  
 18 Q. Okay.  
 19 **A. I was looking for MAS's. I don't think MAS bought**  
 1:09:24PM 20 **any from Target.**  
 21 Q. And now going down to 36 and 37, that says:  
 22 Kazan, off-the-shelf.  
 23 Is that a member of the Kazan law firm that  
 24 purchased that and shipped it to you? Or was it one of  
 1:09:40PM 25 Kazan's clients in a litigation that purchased it and sent

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1:11:18PM 1 Q. In this Container No. 2, just to be clear, there  
 2 as no asbestos identified in it, correct, where the retailer  
 3 was Walmart?  
 4 **A. That's correct.**  
 1:11:30PM 5 Q. And after reviewing this, I did not see any  
 6 containers that were allegedly sourced from Safeway.  
 7 Is that your understanding as well?  
 8 **A. Yes, sir.**  
 9 Q. All right. Thank you.  
 1:11:50PM 10 MR. CHARCHALIS: And I'm sorry, Mr. Court  
 11 Reporter -- or Ian, you may know -- what exhibit are we up  
 12 to?  
 13 MR. DUBIN: I think we were -- the next exhibit is  
 14 11.  
 1:12:49PM 15 MR. CHARCHALIS: Okay. So I'll mark just the  
 16 chart here, to the completion of it, as Exhibit 11.  
 17 And I will provide that to you, Mr. Court  
 18 Reporter.  
 19 (Clarification by the court reporter.)  
 1:12:49PM 20 MR. CHARCHALIS: All right. At the end of the  
 21 deposition, we can just clarify -- you know, confirm what we  
 22 have, and just put a clarification on the record. We don't  
 23 need to take up Dr. Longo's time doing that.  
 24 Q. (BY MR. CHARCHALIS:) And you won't be providing  
 1:12:53PM 25 any testimony about the chain of distribution for any of the

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1:09:45PM 1 it to you?  
 2 **A. I believe it was one of the attorneys. You would**  
 3 **have to look at the chain of custody.**  
 4 Q. Okay. Thank you. Almost through this.  
 1:10:06PM 5 On this one, do you see a Table III?  
 6 No. I, it says: Usually Walmart.  
 7 So that indicates that there is the potential that  
 8 it was not purchased from Walmart. Correct?  
 9 **A. Correct.**  
 1:10:23PM 10 Q. Okay. Since preparing this, you have obtained no  
 11 additional information that would indicate that that was  
 12 definitively from Walmart. Correct?  
 13 **A. I have not received any information along these**  
 14 **lines. That was client sample. So I don't know any more**  
 1:10:45PM 15 **details than what's written there.**  
 16 Q. And now this one's here in II -- I'm sorry. I'll  
 17 go down to III where it says: Dollar General or Fred's  
 18 Dollar or Walmart, you would agree that that means it was  
 19 not definitively from Walmart; it could have been from any  
 1:11:03PM 20 of those three stores. Correct?  
 21 **A. Correct?**  
 22 Q. And you don't have any information indicating  
 23 whether it was more likely Walmart than those other two  
 24 stores?  
 1:11:18PM 25 **A. I do not.**

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1:12:56PM 1 retailers. Correct?  
 2 **A. That is correct. I will not.**  
 3 Q. And you don't have any information about -- well,  
 4 actually withdrawn.  
 1:13:05PM 5 MR. CHARCHALIS: Let me just check my notes. I  
 6 may be complete. All right. That's it for me.  
 7 Thank you very much for your time, Dr. Longo.  
 8 THE WITNESS: Thank you.  
 9 Anybody else?  
 1:13:31PM 10 MR. DUBIN: No, I guess that's it.  
 11 THE WITNESS: Wow. It would be the first J & J  
 12 deposition I ever been in that didn't go three days.  
 13 MR. DUBIN: That's what happens, when I take them.  
 14 THE WITNESS: Oh, you have a question?  
 1:13:42PM 15 MR. DUBIN: No.  
 16 THE WITNESS: Okay. Got it.  
 17 (Exhibit No. 12 was marked for identification.)  
 18 VIDEOGRAPHER: The time is 12:14 p.m., Pacific  
 19 Time, and we're off the record.  
 1:14:04PM 20 This marks the end of Media V.  
 21 (Deposition concludes at 3:14 p.m., Eastern Standard Time.)  
 22 (Signature waived.)  
 23 --0o0--  
 24  
 25

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## 1 CERTIFICATE

2

3 I, the undersigned, a Certified Shorthand Reporter  
4 of the State of California, do hereby certify:

5 That the foregoing proceedings were taken before  
6 me via videoconferencing at the time and place herein set  
7 forth; that any witnesses in the foregoing proceedings,  
8 prior to testifying, were duly sworn; that a verbatim record  
9 of the proceedings was made by me using machine shorthand  
10 which was thereafter transcribed under my direction; that  
11 the foregoing transcript is a true record of the testimony  
12 given.

13 Further, that if the foregoing pertains to the  
14 original transcript of a deposition in a Federal Case,  
15 before completion of the proceedings, review of the  
16 transcript was [ ] was not [ ] requested.

17 I further certify I am neither financially  
18 interested in the action nor a relative or employee of any  
19 attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date subscribed my  
21 name.

22 Dated: March 6, 2023.

23

24 JOHN FAHRENWALD

25 CA CSR 14369



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